

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

SASA MASLIC, individually and on behalf  
of putative class, IVAN DRZAIC, ROBERT  
HERNAUS, LEOPOLD HUBEK, LEON  
HUDOLDETNIJAK, ELVIS KOSCAK,  
TOMICA PANIC, STJEPAN PAPES,  
ZELJKO PULJKO, DARKO SINCEK,  
DAVID STANTE, NEDELJKO ZIVANIC,  
GOGO REBIC, and MITJA POGOREVC,

Plaintiffs,

v.

ISM VUZEM D.O.O., ISM VUZEM USA,  
INC., VUZEM USA, INC., HRID-MONT  
D.O.O., IVAN VUZEM, ROBERT VUZEM,  
EISENMANN CORPORATION, TESLA,  
INC., and DOES 1 THROUGH 50,

Defendants.

Case No. 5:21-cv-2556-BLF-SVK

**JOINT PRETRIAL STATEMENT AND  
ORDER**

Date: August 1, 2024  
Time: 1:30 PM

Hon. Beth Labson Freeman  
Courtroom 3, 5th Floor

1 Plaintiff Sasa Maslic ("Plaintiff" or "Maslic") and Defendant Tesla, Inc. ("Tesla")  
 2 (collectively, the "Parties")<sup>1</sup> respectfully submit this Joint Pretrial Statement and Order.

3 **A. THE ACTION**

4 **1. Parties**

5 The parties for the jury trial scheduled to commence September 16, 2024 are Plaintiff Sasa  
 6 Maslic and Tesla, Inc. ("Parties").

7 The remainder of the Plaintiffs are Ivan Drzaic, Robert Hernaus, Leopold Hubek, Leon  
 8 Hudoldetnjak, Elvis Koscak, Tomica Panic, Stjepan Papes, Zeljko Puljko, Darko Sincek, David  
 9 Stante, Nedeljko Zivanic, Goran "Gogo" Rebic, and Mitja Pogorevc ("Plaintiffs"). Defendants  
 10 Ivan Vuzem, Robert Vuzem, ISM Vuzem, d.o.o., HRID-Mont, d.o.o., and Eisenmann Corporation  
 11 have defaulted. Defendants ISM Vuzem USA, Inc. and Vuzem USA, Inc. have been dismissed  
 12 for lack of service of process. (Dkt. No. 94.)

13 **2. Substance of the Action**

14 Claims

15 Count IX: Trafficking and Coerced Labor under the Trafficking Victims Protection  
 16 Reauthorization Act ("TVPRA") (18 U.S.C. § 1595) by Maslic against all Defendants.

18 *Plaintiff's Position*

19 "[A] defendant is liable for human trafficking for knowingly obtaining an individual's  
 20 labor and services by means of actual and threatened serious harm—including financial and  
 21 psychological harm—or knowingly benefitting from the obtaining of labor by such means."  
 22 *Alabado v. French Concepts, Inc.*, 2016 WL 5929247, at \*4 (C.D. Cal. May 2, 2016).

23 The TVPRA is violated by "(B) the recruitment, harboring, transportation, provision, or  
 24 obtaining of a person for labor or services, through the use of force, fraud, or coercion for the  
 25 purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery." 22 U.S.C. §

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27 <sup>1</sup> Clerk's Entry of Default against Defendants ISM Vuzem, d.o.o., HRID-Mont, d.o.o., Ivan  
 28 Vuzem and Robert Vuzem were filed on March 30, 2022. No input was made by Slovenian  
 attorney Urska Kezmah or defaulted defendants.

1 7102; Public Law 106-386.

2 Coercion includes "(C) the abuse or threatened abuse of the legal process." 22 U.S.C. §  
 3 7102(3)(C); See Public Law 106-386, Sec. 103, subs (2) (Addendum, Item 14).

4 Coercion is defined in the statute as an action against one individual to exert pressure on  
 5 another individual or individuals.

6 "Serious harm" referenced in § 1589(a)(2) is "any harm, whether physical or nonphysical,  
 7 including psychological, financial, or reputational harm," that is serious enough to compel a  
 8 reasonable person to perform labor to avoid the harm. (*See United States v. Dann*, 652 F.3d 1160,  
 9 1169 (9th Cir. 2011) (noting statutory amendments in 2000 sought to broaden § 1589 to nonviolent  
 10 conduct by defining serious harm more broadly)).

11 Section 1589(a)(2) prohibits the coercion of labor through "any harm, whether physical or  
 12 nonphysical, including psychological, financial, or reputational harm," that is serious enough to  
 13 compel a reasonable person to perform labor to avoid the harm. (*See Dann*, 652 F.3d at 1169–72  
 14 (affirming § 1589 conviction where defendant threatened undocumented nanny with withholding  
 15 back pay, false accusations of theft, immigration consequences, and the defendant's potential loss  
 16 of child custody)).

17 "[M]ultiple jurisdictions have found that the threat of deportation may itself constitute a  
 18 threat sufficient to satisfy the second and/or third element of [§ 1589] forced labor." (*Echon v.  
 19 Sackett*, 2017 WL 4181417, at \*14 (D. Colo. Sept. 20, 2017), report and recommendation adopted,  
 20 2017 WL 5013116 (D. Colo. Nov. 1, 2017) 14; *Nuñag-Tanedo v. E. Baton Rouge*, 790 F. Supp.  
 21 2d 1134, 1146 (C.D. Cal. 2011) (holding threat of deportation constitutes "abuse of legal process"  
 22 within the meaning of § 1589 in cases concerning H1-B visa holders); *Aguirre v. Best Care  
 23 Agency*, 961 F. Supp. 2d 427, 444 (E.D.N.Y. 2013) (stating that "[t]he threat of deportation alone  
 24 may support a claim for forced labor" under § 1589)).

25 Liability against Tesla is based on Tesla being a person who "knowingly benefits,  
 26 financially or by receiving anything of value from participation in a venture which that person  
 27 knew or should have known" committed a violation of applicable trafficking and forced labor  
 28 laws. (*See Shuvalova v. Cunningham*, 2010 WL 5387770, at \*3 n.3 (N.D. Cal. Dec. 22, 2010)

1 (explaining liability)).

3 *Defendant's Position*

4 Tesla contends that the citations offered by Plaintiff do not expand the scope of 18 U.S.C.  
5 § 1595, the actual section of the United States Code on which his claim is based, nor do they  
6 increase the potential bases of liability here.

7 *Joint Position*

8 Under 18 U.S.C. § 1589,

9 **(a)** Whoever knowingly provides or obtains the labor or services of a person by any one of, or by  
10 any combination of, the following means--

11       **(1)** by means of force, threats of force, physical restraint, or threats of physical restraint to  
12           that person or another person;  
13       **(2)** by means of serious harm or threats of serious harm to that person or another person;  
14       **(3)** by means of the abuse or threatened abuse of law or legal process; or  
15       **(4)** by means of any scheme, plan, or pattern intended to cause the person to believe that,  
16           if that person did not perform such labor or services, that person or another person would  
17           suffer serious harm or physical restraint,

18 shall be punished as provided under subsection (d).

19 **(b)** Whoever knowingly benefits, financially or by receiving anything of value, from participation  
20 in a venture which has engaged in the providing or obtaining of labor or services by any of the  
21 means described in subsection (a), knowing or in reckless disregard of the fact that the venture  
22 has engaged in the providing or obtaining of labor or services by any of such means, shall be  
23 punished as provided in subsection (d).

24 **(c)** In this section:

25       **(1)** The term “abuse or threatened abuse of law or legal process” means the use or  
26           threatened use of a law or legal process, whether administrative, civil, or criminal, in any  
27           manner or for any purpose for which the law was not designed, in order to exert pressure

1 on another person to cause that person to take some action or refrain from taking some  
2 action.

3 (2) The term “serious harm” means any harm, whether physical or nonphysical, including  
4 psychological, financial, or reputational harm, that is sufficiently serious, under all the  
5 surrounding circumstances, to compel a reasonable person of the same background and in  
6 the same circumstances to perform or to continue performing labor or services in order to  
7 avoid incurring that harm.

8 (d) Whoever violates this section shall be fined under this title, imprisoned not more than 20 years,  
9 or both. If death results from a violation of this section, or if the violation includes kidnaping, an  
10 attempt to kidnap, aggravated sexual abuse, or an attempt to kill, the defendant shall be fined under  
11 this title, imprisoned for any term of years or life, or both.

12 18 U.S.C.A. § 1589.

13 Under 18 U.S.C. § 1595(a) (Civil Remedy),

14 (a) An individual who is a victim of a violation of this chapter may bring a civil action against the  
15 perpetrator (or whoever knowingly benefits, or attempts or conspires to benefit, financially or by  
16 receiving anything of value from participation in a venture which that person knew or should have  
17 known has engaged in an act in violation of this chapter) in an appropriate district court of the  
18 United States and may recover damages and reasonable attorney’s fees

19 18 U.S.C.A. § 1595; First Amended Complaint, Dkt. No. 063, ¶ 108-140.

20 Defenses

21 1. Plaintiff Sasa Maslic’s allegations fail to state a claim upon which relief can be granted.  
22 2. Plaintiff Sasa Maslic’s claims are barred by the doctrines of waiver and/or estoppel.  
23 a. Elements of Waiver – the essential elements of waiver are (1) the intentional  
24 relinquishment or abandonment (2) of a known right or privilege, (3) with  
25 knowledge of the facts, (4) with an existing right, (5) and the waiving party’s  
26 knowledge, actual or constructive, (6) actual intent or equivalent conduct, and (7)  
27 voluntariness. *Lynch v. California Coastal Com.*, 3 Cal. 5th 470, 219 Cal. Rptr. 3d  
28 754, 396 P.3d 1085 (Cal. 2017).

1                   b. Elements of Estoppel – to apply the doctrine of estoppel, the following elements  
 2                   must be present: (1) the party to be estopped must be apprised of the facts; (2) the  
 3                   party to be estopped must intend that its conduct shall be acted upon, or must so  
 4                   act that the party asserting the estoppel had a right to believe it was so intended;  
 5                   (3) the other party must be ignorant of the true state of the facts; and (4) the party  
 6                   asserting estoppel must rely upon the conduct due to its injury. *Feduniak v.*  
 7                   *California Coastal Com.* 148 Cal.App.4th 1346, 1359 (2007).

8                   3. Plaintiff Sasa Maslic's claims are barred by the doctrine of laches given his delay in  
 9                   asserting his claims, which has prejudiced Tesla including because of the fading memories  
 10                  of witnesses who would contradict Mr. Maslic's claims.

11                  a. The elements of laches include (1) the plaintiff unreasonably delayed in filing the  
 12                  lawsuit, and (2) the plaintiff's delay caused prejudice to the defendant. *Jarrow*  
 13                  *Formulas, Inc. v. Nutrition Now, Inc.*, 304 F.3d 829, 835 (9th Cir. 2002).

14                  4. To the extent Plaintiff Sasa Maslic has failed to mitigate his damages, his claims are barred  
 15                  and/or his remedy is diminished.

16                  a. “A person injured by the wrongful act of another is bound ... to exercise reasonable  
 17                  care and diligence to avoid loss or minimize the resulting damages and cannot  
 18                  recover for losses which might have been prevented by reasonable efforts and  
 19                  expenditures on his part.” *U.S. v. Sierra Pacific Industries*, 879 F.Supp.2d 1128  
 20                  (E.D. Cal. 2012).

21                  5. To the extent that Plaintiff Sasa Maslic sustained any of his alleged damages, such  
 22                  damages were caused by acts or omissions of persons or entities for whose conduct Tesla  
 23                  is not legally responsible and over whom Tesla had no control.

24                  a. Under comparative fault principles, damages are apportioned based upon the  
 25                  various causes contributing to a plaintiff's harm, as opposed to a particular  
 26                  defendant's negligence.<sup>2</sup>

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28                  <sup>2</sup> *Li v. Yellow Cab Co.* (1975) 13 Cal.3d 804, 813, 119 Cal.Rptr. 858, 532 P.2d 1226.

1       6. To the extent that Plaintiff Sasa Maslic sustained any of his alleged damages, there was an  
2                   intervening and/or superseding cause or causes leading to the alleged damages, and  
3                   therefore any alleged act or omission by Tesla was not the proximate cause of the alleged  
4                   damages

5                   a. A superseding cause is an act of a third person or other force which by its  
6                   intervention prevents the actor from being liable for harm to another which his  
7                   antecedent negligence is a substantial factor in bringing about.<sup>3</sup>  
8                   b. An intervening force is one which actively operates in producing harm to another  
9                   after the actor's negligent act or omission has been committed.<sup>4</sup>

10 (Tesla, Inc.'s Answer to First Amended Complaint, Dkt. No. 82).

11                  **3. Relief Sought**

12                  Failure to pay reasonable value of services rendered. This is calculated at \$55 per hour  
13 base pay as stated by Elon Musk, for a loss [to be calculated, estimated \$250,000]

14                  Underpaid wages [calculation of FLSA and California Labor Code wages and penalties  
15 for all work in US of \$141,461.15]

16                  Loss of income, calculated at \$3,000 to \$5,000 (U.S. Dollars) working 40 hours per week  
17 as a refrigeration unit fitter, for eight years. 3,000 per week x 50 weeks x 8 years equals  
18 \$1,200,000

19                  Future loss of income, \$3,000 to \$5,000 (U.S. Dollars) working 40 hours per week as a  
20 refrigeration unit fitter, from age 60 to age 70, being for ten years. 3,000 per week x 50 weeks  
21 x 8 years equals \$1,500,000

22                  Pain and suffering, based on injury to back and hips, heart attack, surgery, and  
23 limitations in life activities. See CACI 3905A "[physical pain/mental  
24 suffering/loss of enjoyment of life/disfigurement/physical impairment/  
25 inconvenience]"

26 Emotional distress from being afraid when working

27 \_\_\_\_\_  
28 <sup>3</sup> Restatement (Second) of Torts § 440.

<sup>4</sup> Restatement (Second) of Torts § 440(1).

1 Emotional distress from the effects of injuries sustained when working  
2 Emotional distress from financial fears  
3 Punitive damages  
4 Attorney's fees  
5 Costs

6       **4. Federal Jurisdiction and Venue**

7       This Court has federal question jurisdiction 28 U.S.C. § 1331 based on Plaintiff Sasa  
8 Maslic's Trafficking Victims Protection Reauthorization Act claims 18 U.S.C. § 1595, *et seq.*

9       This Court is the proper venue based on predicate acts occurring in Fremont, California  
10 within the forum state and within this judicial district.

11     **B. FACTUAL BASIS OF THE ACTION**

12     **1. Undisputed Facts**

13     The parties stipulate that the following facts may be incorporated into the trial record:

14     1. Plaintiff Sasa Maslic is and was a citizen of and resident of Bosnia.

15     2. Defendant ISM Vuzem d.o.o. is a Slovenian business entity with its principal place  
16 of business in Slovenia.

17     3. Defendants Robert Vuzem and Ivan Vuzem are residents of Slovenia. They were  
18 officers and directors of, exercised control over, and participated in the actions of ISM Vuzem,  
19 d.o.o.

20     4. ISM Vuzem USA, Inc. was a South Carolina corporation with its principal place  
21 of business in South Carolina.

22     5. ISM Vuzem USA, Inc. was dissolved in August 2015 while construction services  
23 were being provided by ISM Vuzem, d.o.o. employees, including Sasa Maslic, at Tesla's Fremont  
24 facility.

25     6. Vuzem USA, Inc. was a California corporation with its principal place of business  
26 in California.

27     7. Vuzem USA Inc. was incorporated in California on September 2, 2014.

28     8. Defendant HRID-MONT d.o.o. is a Slovenian corporation with its principal place

1 of business in Slovenia. It is the entity that some defendants (but not Tesla) transferred employees,  
2 contracts and assets to.

3 9. On or about June 10, 2014, Plaintiff Maslic left Slovenia for Greenville, South  
4 Carolina for his first assignment with ISM Vuzem, d.o.o. at a BMW factory in Greenville.

5 10. Plaintiff Maslic was a direct employee of ISM Vuzem, d.o.o.

6 11. Plaintiff Maslic provided construction services to build out the Tesla, Inc. paint  
7 shop in Fremont, California between February 2015 and May 2016.

8 12. ISM Vuzem d.o.o. was a subcontractor to Eisenmann Corporation for the work at  
9 the Tesla, Inc. paint shop in Fremont, California.

10 13. Eisenmann Corporation provided construction services pursuant to contracts with  
11 Tesla, Inc.

12 14. Tesla, Inc. contracted with Eisenmann Corporation to construct the new paint shop  
13 in Fremont, California.

14 15. Tesla, Inc. had knowledge that Plaintiff Maslic came to work at its Fremont facility  
15 pursuant to a B1/B2 visa.

16 2. **Disputed Facts**

17 **Defendant Tesla, Inc.'s Disputed Facts**

18 1. Following Plaintiff Maslic's complaint to Klemen Vuzem at the BMW factory in  
19 2014, the alleged discrimination subsided, and his working conditions improved.

20 2. Plaintiff Maslic did not have any issues with the number of hours worked or his  
21 living conditions while working for ISM Vuzem, d.o.o. at the BMW factory.

22 3. Plaintiff Maslic returned to Bosnia in September 2014 for approximately two  
23 weeks before returning to the United States for his second assignment.

24 4. Following his assignment at the BMW factory, Plaintiff Maslic voluntarily  
25 accepted his next assignment for ISM Vuzem, d.o.o., at Tesla, Inc.'s Fremont, California paint  
26 shop and was not coerced to do so.

27 5. Plaintiff Maslic accepted the assignment to work for ISM Vuzem, d.o.o. in  
28 Fremont, California voluntarily.

1       6. Plaintiff Maslic voluntarily accepted his second assignment for ISM Vuzem, d.o.o.,  
2 at Tesla, Inc.'s Fremont, California paint shop because the position paid better than other available  
3 employment in Bosnia, he needed money to support his children's education, and his family and  
4 hometown in Eastern Europe were still recovering from a major flood.

5       7. Plaintiff Maslic voluntarily accepted successive assignments to work for ISM  
6 Vuzem, d.o.o. at Tesla, Inc.'s paint shop in Fremont, California, totaling four to five assignments  
7 from 2015 to 2016.

8       8. At all times during his assignments with ISM Vuzem, d.o.o., Plaintiff Maslic  
9 always had possession of his passport and cell phone.

10      9. Plaintiff Maslic's accommodations at the Fremont, California paint shop were  
11 excellent, and the corporate housing complex included both a pool and health club.

12      10. When ISM Vuzem, d.o.o. terminated Plaintiff Maslic's employment, he was  
13 disappointed and angry because he planned to accept future assignments with the company in the  
14 United States or elsewhere.

15      11. Plaintiff Maslic alleges that he had no health issues prior to beginning work at ISM  
16 Vuzem, d.o.o.

17      12. During his six U.S.-based assignments for ISM Vuzem, d.o.o., Plaintiff Maslic was  
18 free to leave his lodging when not working.

19      13. While he was free to leave his lodging while on assignment for ISM Vuzem, d.o.o.,  
20 Plaintiff Maslic did not go on trips with his colleagues to San Francisco, Los Angeles, and Las  
21 Vegas because he felt he could not afford the travel.

22      14. Eisenmann paid ISM Vuzem d.o.o. at a rate of approximately \$55 / hour for Vuzem  
23 employee time.

24      15. Tesla understood that Eisenmann compensated Vuzem subcontractor employee  
25 time at a rate of approximately \$55 / hour.

26

27

Plaintiff Sasa Maslic's Disputed Facts

28      16. ISM Vuzem, d.o.o. by its supervisors and management threatened Plaintiff Sasa

1 Maslic and his co-workers over US visa status, EU visa status, monetary reimbursements, and  
2 reputation, in order to coerce them to work and continue to work.

3       17. ISM Vuzem, d.o.o. threatened to cancel its workers' visas, in order to coerce them  
4 to work and continue to work.

5       18. ISM Vuzem, d.o.o. threatened to harm its workers' reputations, in order to coerce  
6 them to work and continue to work.

7       19. ISM Vuzem, d.o.o. threatened to require its workers to repay costs of visas,  
8 transportation and housing, in order to coerce them to work and continue to work.

9       20. ISM Vuzem, d.o.o. threatened to withhold pay if its workers became too sick to  
10 work or reported a job injury, in order to coerce them to work and continue to work.

11       21. ISM Vuzem, d.o.o. threatened to withhold medical benefits if workers reported a  
12 job injury, in order to coerce them to work and continue to work.

13       22. ISM Vuzem, d.o.o. filed and threatened to file a civil suit against its workers, in  
14 order to coerce them to work and continue to work.

15       23. ISM Vuzem, d.o.o. would rather an employee died than pay them money.

16       24. The Vuzems obtained Sasa Maslic's labor and services by coercion.

17       25. Sasa Maslic was coerced by visa, economic, and reputational threats to work long  
18 hours in unsafe conditions, resulting in injury.

19       26. Vuzem USA, Inc. had no employees.

20       27. Vuzem USA, Inc. is not a party to any written contract produced in this or any  
21 other action.

22       28. Vuzem USA, Inc. was not an employer of Sasa Maslic or his co-workers from ISM  
23 Vuzem, d.o.o.

24       29. Defendant HRID-MONT d.o.o. is a Slovenian corporation with its principal place  
25 of business in Slovenia. It is the entity that the other defendants transferred employees, contracts  
26 and assets to.

27       30. ISM Vuzem, d.o.o. hired as a supervisor a convicted labor trafficker

28       31. Plaintiff Maslic provided construction services to build out the Tesla, Inc. paint

1 shop in Fremont, California between November 2014 and June 2016.

2 32. ISM Vuzem d.o.o. was a subcontractor to Eisenmann Corporation

3 33. ISM Vuzem, d.o.o. did not have a license to provide construction services in  
4 California.

5 34. ISM Vuzem USA, Inc. did not have a license to provide construction services in  
6 California.

7 35. Vuzem USA, Inc. has a license to provide construction services in California but  
8 only for its single individual owner.

9 36. Vuzem USA, Inc. had no employees.

10 37. Eisenmann Corporation did not have a license to provide construction services in  
11 California.

12 38. Tesla, Inc. knew that none of ISM Vuzem, d.o.o., ISM Vuzem USA, Inc., Vuzem  
13 USA, Inc. or Eisenmann Corporation had a license to provide construction services in California.

14 39. Tesla, Inc. did not at any time after 2011 have a license to provide construction  
15 services in California. Tesla, Inc. did not during the build out of its Fremont plant have a license  
16 to provide construction services in California.

17 40. A contractor's license is required to provide the construction services that the  
18 Vuzem entities and Eisenmann Corporation provided at Tesla's Fremont facility.

19 41. Neither ISM Vuzem, d.o.o., nor ISM Vuzem USA, Inc., nor Vuzem USA, Inc. had  
20 workers compensation coverage for work in California.

21 42. Neither ISM Vuzem, d.o.o., nor ISM Vuzem USA, Inc., nor Vuzem USA, Inc.  
22 were permissibly self-insured for workers compensation coverage for work in California.

23 43. Tesla, Inc. knew that none of ISM Vuzem, d.o.o., ISM Vuzem USA, Inc., or Vuzem  
24 USA, Inc. had workers compensation coverage.

25 44. Tesla, Inc. knew that none of ISM Vuzem, d.o.o., ISM Vuzem USA, Inc., or Vuzem  
26 USA, Inc. were permissibly self-insured for workers compensation coverage.

27 45. Workers' compensation coverage is required for every employer in the State of  
28 California.

1       46. ISM Vuzem, d.o.o. prepared written documents containing false information that  
2 was given to the United States Consulate in connection with issuance of the B1/B2 visas.

3       47. Eisenmann Corporation prepared written documents containing false information  
4 that was given to the United States Consulate in connection with issuance of the B1/B2 visas.

5       48. ISM Vuzem, d.o.o. controlled its workers' travel, housing, hours, and work  
6 conditions.

7       49. Tesla, Inc, knew that ISM Vuzem, d.o.o. controlled its workers' travel, housing,  
8 hours, and work conditions.

9       50. Tesla, Inc. required, created and maintained entrance and exit records for the Tesla  
10 plant.

11       51. Tesla, Inc. had knowledge of and recorded that Sasa Maslic worked long hours at  
12 its Fremont facility.

13       52. Tesla, Inc. EHS Supervisor Bobby Gonzales was not truthful in his deposition  
14 about the heavy pipes that the Vuzem workers installed.

15       53. Tesla, Inc. had knowledge that Sasa Maslic worked in unsafe conditions at its  
16 Fremont facility.

17       54. Tesla, Inc. knew that several Vuzem employees were injured working at its  
18 Fremont facility

19       55. Tesla had written notification of the facts of coercion when it was served on  
20 September 28, 2015 with the First Amended Complaint in Lesnik v ISM Vuzem, Alameda  
21 Superior Court action HG15773484.

22       56. Tesla had written notification of the facts of coercion when it received records  
23 subpoenaed from Regional Medical Center of San Jose

24       57. Tesla knew that the ISM Vuzem, d.o.o. supervisors yelled at the workers

25       58. Defendant Tesla had on site supervisors who could and did see and hear the work  
26 place interactions between Vuzem supervisors and management and the workers including Sasa  
27 Maslic.

28       59. Eisenmann had safety supervisors who understood the Serbo-Croatian language

1       60.    Tesla had a supervisor who understood the Serbo-Croatian language

2       61.    Defendant Tesla had the right to see and did see subcontractor history,  
3 subcontractor contracts, insurance policies, visa information for all workers, and injury  
4 information.

5       62.    Defendant Tesla knew that ISM Vuzem, d.o.o. flew any injured worker out of the  
6 US and back to Slovenia or their home country.

7       63.    Tesla's managers in EHS, Contractor Safety, and Workers Compensation wrote  
8 that Vuzem should not work at the Tesla site.

9       64.    Tesla continued to hire and allow and enabled Eisenmann to hire the Vuzems to  
10 work at the Tesla site, with dozens of change orders providing the Vuzems additional work.

11       65.    Tesla continued to retain Vuzem to provide services at its Fremont facility after it  
12 knew or should have known of the coerced labor

13       66.    Tesla continued to retain Eisenmann to provide services at its Fremont facility after  
14 it knew or should have known of the coerced labor

15       67.    Tesla continued to pay Eisenman and in turn Vuzems under change orders for more  
16 than a year after it knew or should have known of the coerced labor

17       68.    Tesla continued to pay Eisenman for more than two years after it knew or should  
18 have known of the coerced labor.

19       69.    Tesla, Inc. knew or should have known that the Vuzems engaged in a venture that  
20 provided and obtained labor or services by means of coercion.

21       70.    Tesla, Inc. knew or should have known that Eisenman Corporation engaged in a  
22 venture that provided and obtained labor or services by means of coercion.

23       71.    Tesla acted in knowing or reckless disregard of the fact that the venture was  
24 engaged in the providing or obtaining of labor or services by coercion.

25       72.    Tesla, Inc. benefitted financially or by receiving value from participation in a  
26 venture that engaged in the providing or obtaining of labor or services by coercion.

27       73.    The nature and extent of Plaintiff Maslic's recoverable compensatory damages  
28 under a TVPRA claim.

74. Whether Tesla, Inc. acted in conscious disregard of the rights of Sasa Maslic.
75. Whether Tesla, Inc. should pay exemplary damages.
76. The nature and amount of exemplary damages that Tesla, Inc. should pay.

## C. DISPUTED LEGAL ISSUES

The parties dispute the following points of law:

Was Plaintiff Trafficked within the Meaning of 18 U.S.C. § 1589?

To prevail on a forced labor claim, Plaintiff must show that Vuzem obtained his labor by one of the four means enumerated in Section 1589 and that Tesla knowingly benefitted from Vuzem obtaining Plaintiff's forced labor pursuant to Section 1595.

Under Ninth Circuit law, obtaining forced labor “by means of” requires causation and a proximate link between one or more of the unlawful means in Section 1589(a) and the labor actually obtained. *Martinez-Rodriguez v. Giles*, 31 F.4th 1139, 1155 (9th Cir. 2022), citing *Headley v. Church of Scientology Int'l*, 687 F.3d 1173, 1179-80 (9th Cir. 2012).

“Serious harm” requires a showing “that is sufficiently serious, under all the surrounding circumstances, to compel a reasonable person of the same background and in the same circumstances to perform or to continue performing labor or services in order to avoid incurring that harm. *Id.*, citing 18 U.S.C. § 1589(c)(2).

### *Tesla's Position*

Tesla contends that Plaintiff was not forced to labor against his own will under 18 U.S.C. § 1589(a) because he voluntarily took successive assignments in California. Plaintiff admits that he was threatened only once while employed by Vuzem (a threat that did not involve Tesla). After Plaintiff successfully persuaded Vuzem to change his direct supervisor early in his tenure in the United States, he did not experience discrimination. Plaintiff completed a three-month assignment at Defendant Eisenmann’s BMW factory and then voluntarily returned to the United States for his second assignment at Tesla. Further, Plaintiff has already testified that he voluntarily took these additional assignments at Tesla to better provide for his family, and was upset when he was fired by Vuzem in 2016 because he planned to continue working for Vuzem.

Here, Plaintiff continued to work for Vuzem despite a threat made early in his tenure, took

1 six separate assignments at Tesla, and wanted to continue working for Vuzem prior to his  
 2 termination. There is no causal link between the threats made to Plaintiff (not by Tesla) early in  
 3 his first assignment at BMW and Plaintiff's continued employment at Vuzem.

4 *Plaintiff's Position*

5 Plaintiff contends that accepting work and continuing to work are not defenses to a TVPRA  
 6 claim.

7

8 Can Plaintiff Demonstrate that Tesla, Inc. Knew or Should Have Known that Plaintiff was  
 9 Trafficked?

10 To prevail under Section 1595 and the TVPRA, Plaintiff must prove that Tesla (1) obtained  
 11 a financial benefit from a venture that relied on a plaintiff's coerced labor, and (2) knew or should  
 12 have known about the plaintiff's coerced labor. 18 U.S.C. § 1595(a).

13 Tesla contends that Plaintiff cannot demonstrate that Tesla knew or should have known  
 14 that he was trafficked to create liability under federal or state law. Despite voluminous discovery,  
 15 Tesla argues that Plaintiff has produced no evidence that anyone at Tesla was aware of any alleged  
 16 threats or coercion by Vuzem; that the one occasion where Plaintiff was threatened was from  
 17 Vuzem, not Tesla; and that this occurred while he was working at a BMW factory in Greenville,  
 18 South Carolina. Tesla further maintains that Plaintiff has never asserted that he was threatened at  
 19 Tesla or that anyone else he knew was threatened at Tesla.

20 Plaintiff contends that liability under the TVPRA may be based on threats to him or to  
 21 others.

22 Tesla also maintains that Plaintiff cannot prove that Tesla "should have known" that  
 23 Vuzem engaged in activities in violation of the TVPRA. Courts in the Ninth Circuit have held that  
 24 to support a direct liability theory under Section 1595, plaintiffs must show how defendants  
 25 "received notice that Plaintiff...was trafficked at their respective properties" and concluded that  
 26 plaintiffs failed to state facts sufficient for liability under the TVPRA. See *A.B. v. Hilton*  
 27 *Worldwide Holdings Inc.*, 484 F. Supp. 3d 921, 939 (D. Or. 2020). Holding defendants liable  
 28 under the "knowingly benefitted" theory generally requires evidence that the defendant was aware

1 of an actual threat. See *Ruelas v. Cnty. Of Alameda*, 519 F. Supp. 3d 636, 650 (holding that  
 2 plaintiffs pled sufficient facts that defendant knowingly benefitted from a trafficking venture  
 3 where the defendant's employees observed sheriff's deputies supervising prisoner-employees  
 4 using threats of force).

5 Tesla asserts that Plaintiff fails to meet the required threshold because he never stated that  
 6 he was threatened by anyone during or through his work at the Tesla paint shop. Furthermore,  
 7 Plaintiff's contention that he was sometimes allowed to work without proper protective equipment  
 8 is far too attenuated to reasonably even argue that Tesla knew or should have known that Plaintiff  
 9 was allegedly trafficked.

10 Simply stated, Tesla's position is that Plaintiff has produced no evidence that Tesla  
 11 witnessed any specific event that would give rise to an inference of knowledge that Vuzem  
 12 engaged in acts prohibited by the TVPRA .

13 Plaintiff contends that he was threatened, his co-workers were threatened, and that these  
 14 threats were real and his understanding of them was reasonable. Plaintiff contends that Tesla  
 15 knew of facts and events that are indicia of coerced labor.

16 **D. ESTIMATE OF TRIAL TIME**

17 The parties estimate that the jury trial as to the TVPRA claim by Sasa Maslic against Tesla  
 18 will require ten full days for testimony, additional to opening and closing statements and jury  
 19 instructions. Plaintiff's case in chief will take six full days of testimony, including because of  
 20 time for translation. Jury selection will proceed on September 13.

21 **E. TRIAL ALTERNATIVES AND OPTIONS**

22 **1. Settlement Discussion**

23 The parties have held discussions concerning settlement during the pendency of this  
 24 proceeding and are scheduled for a settlement conference before Magistrate Judge van Keulen on  
 25 July 31, 2024.

26 During a pretrial conference on July 8, 2024, Plaintiff made a settlement offer, to which  
 27 Tesla has not yet responded.

28 **2. Amendments or Dismissals**

None, other than as ordered by this Court.

### **3. Bifurcation or Separate Trial of Issues**

All defendants other than Tesla, Inc. have been served but either have not appeared or have had their responsive pleadings stricken.

Bifurcation or a separate trial of all claims other than the TVPRA claim against Tesla, Inc. should proceed by motion for default judgment against all Defendants other than Tesla.

The foregoing admissions having been made by the parties, and the parties having specified the foregoing issues of fact and law remaining to be litigated, this order shall supplement the pleadings and govern the course of trial of this action, unless modified to prevent manifest injustice.

Dated: July 18, 2024

/s/

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William C. Dresser  
Counsel for Plaintiffs

Dated: July 18, 2024

/s/

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Aaron Bernay  
Counsel for Tesla, Inc.

## FILER'S ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), I, William C. Dresser, hereby attest that concurrence in the filing of this document has been obtained from each of the above signatories.

Dated: July 18, 2024

/s/  
William C. Dresser  
Counsel for Plaintiffs  
Sasa Maslic, et al

## **APPENDIX 1 – WITNESS LIST**

## Plaintiff's Witnesses

## 1. Witnesses Who Will be Called to Testify

Sasa Maslic. Mr. Maslic will testify to his hiring by ISM Vuzem, d.o.o., his obtaining Slovenia European Union and United States B1/B2 visas, his work and wages history, and the coercion to compel his employment as set forth in his declarations in US ex rel Lesnik, ND California action C16-1120, ECF # 235, 462, 563, and 613-1 and in his declarations in the within action, ECF # 127-2 and 140-1. He will also authenticate documents.

Stejepan Novoselec. Mr. Novoselec will testify to facts stated in his declaration, attached declaration of Radmilo Bozinovic, ECF # 487-3 in US ex rel Lesnik, and as alleged in the August 27, 2020 filed complaint in this action.

Stjepan Papes. Mr. Papes will testify to facts stated in his declaration, attached declaration of Radmilo Bozinovic, ECF # 487-3 in US ex rel Lesnik, and as alleged in the August 27, 2020 filed complaint in this action.

Darko Sinek. Mr. Sinek will testify to facts stated in his declaration, attached declaration of Radmilo Bozinovic, ECF # 487-3 in US ex rel Lesnik, and as alleged in the August 27, 2020 filed complaint in this action. Mr. Sincek will also testify to the threats by Vuzem supervisors and its affect that he observed on co-workers including Sasa Maslic, and to his observations of Sasa Maslic's work place accidents, injuries, and physical condition from working at the Tesla Fremont site.

Dr. Milan Jovanovic. Dr. Jovanovic will testify to his examination, medical care, and diagnosis and prognosis for hip injury for Sasa Maslic. This includes that upon surgery for hip replacement his observations and findings confirmed the cause of Mr. Maslic's hip condition requiring surgery was injury and not degenerative condition. He will also testify to the records created and reviewed, and to his medical reports and statements in rule 26 disclosure.

Dr. Ramzy Rimawi, M.D. will testify to his medical reports and statements from his deposition, including concerning Sasa Maslic's medical care and his opinion that the cause of Mr. Maslic's hip condition requiring surgery was injury and not degenerative condition. He will also

1 testify to the records created and reviewed, and to his medical reports and statements in rule 26  
 2 disclosure.

3 Danijel Travancic. Mr. Travancic will testify to Vuzem supervisors lying to doctors and  
 4 medical staff at Regional Medical Center to release Gregor Lesnik to then to put him on a long  
 5 transatlantic flight – when he had a fractured leg that he was scheduled for surgery on. He will  
 6 testify that managers threatened him. He will testify that the Vuzems lied about obtaining an  
 7 agreement for settlement of serious injury claims. He will testify to the facts to support that the  
 8 Vuzems would rather have put Gregor Lesnik at risk of death rather than pay him money. He will  
 9 also testify about the housing, transportation and hours of work for Vuzem workers.

10 William Dresser. Mr. Dresser will testify to authentication of photographs taken at the  
 11 Tesla plant in Fremont, California.

12 Luka Divjak. Mr. Divjak will testify to service on Vuzem entities and relationship of  
 13 corporate entities.

14 Cathy Tseng, case manager, social worker, retired Regional Medical Center of San Jose.  
 15 Ms. Tseng will testify to her conversations with and interactions with Vuzem supervisors. She  
 16 will also authenticate documents.

17 Radmillo Bozinovic will testify concerning the audio of the translations for the deposition  
 18 of Sasa Maslic, and the denotation and connotation for the questions asked by defense counsel in  
 19 that deposition.

20 Custodian of Records, Gordon & Rees. The Custodian of Records for Gordon & Rees will  
 21 testify to authentication of discovery requests, discovery responses, subpoenas, and receipt of  
 22 records including San Jose Regional Medical Center records for Gregor Lesnik.

23 Michal Kubicki. Mr. Kubicki will testify that he worked at Gordon & Rees, working as  
 24 an associate under Brian Paul Maschler, deceased. Mr. Kubicki will testify to authentication  
 25 including timing of discovery requests, discovery responses, subpoenas, and receipt of records  
 26 including San Jose Regional Medical Center records for Gregor Lesnik. He will also testify about  
 27 the joint defense agreement between Tesla, Eisenmann and Vuzem including the sharing of  
 28 discovery evidence.

1 Custodian of Records, Harrington, Foxx, Dubrow & Canter, LLP, San Francisco. The  
 2 Custodian of Records for Harrington, Foxx will testify to authentication including timing of  
 3 discovery requests, discovery responses, subpoenas, and receipt of records including San Jose  
 4 Regional Medical Center records for Gregor Lesnik. The custodian will also testify about the joint  
 5 defense agreement between Tesla, Eisenmann and Vuzem including the sharing of discovery  
 6 evidence.

7 Anoush C. Holaday. Ms. Holaday will testify that she is and was an attorney working for  
 8 Wood, Smith Henning & Berman, LLP, Petaluma, for ISM Vuzem USA, Inc. Ms. Holaday will  
 9 testify to authentication including timing of discovery requests, discovery responses, subpoenas,  
 10 and receipt of records including San Jose Regional Medical Center records for Gregor Lesnik.  
 11 Ms. Holaday, including as records custodian, will also testify about the joint defense agreement  
 12 between Tesla, Eisenmann and Vuzem including the sharing of discovery evidence.

13 Amee Mikacich. Ms. Mikacich will testify that she was defense counsel for Eisenmann  
 14 Corporation in Alameda County Superior Court action HG15773484. She will testify concerning  
 15 documents produced by Eisenmann Corporation in that action on February 11, 2016, and about  
 16 documents produced by Eisenmann SE in that action on April 25, 2016. Ms. Mikachich will also  
 17 testify to authentication including timing of discovery requests, discovery responses, subpoenas,  
 18 and receipt of records including San Jose Regional Medical Center records for Gregor Lesnik.  
 19 Ms. Mikachich will also testify about the joint defense agreement between Tesla, Eisenmann and  
 20 Vuzem including the sharing of discovery evidence. Ms. Mikacich will testify to the authenticity  
 21 of the June 13, 2013 Eisenmann press release re major deal BMW, and to the September 29, 2014  
 22 dated Eisenmann-Vuzem-Minutes of Meeting 9-29-14 produced by Tesla, Inc. on January 26,  
 23 2016 and by Eisenmann Corporation on February 11, 2016 in response to requests to produce in  
 24 Alameda County Superior Court action HG15773484.

25 Gregory Grinberg. Mr. Grinberg will testify to his attending, and to the transcript of  
 26 deposition of Miljan Vukadinovic taken on July 24, 2015 in State of California WCAB proceeding  
 27 ADJ9981538, portions of which are exhibit CC to August 9, 2018 Declaration (ECF # 237) in US  
 28 ex rel Lesnik v Eisenmann, SE, of the deposition of Primoz Planovsek taken on July 24, 2015 in

1 State of California WCAB proceeding ADJ9981538, and of the transcript of deposition of Gregor  
 2 Lesnik taken on September 11, 2015 in State of California WCAB proceeding ADJ9981538. Mr.  
 3 Grinberg will also identify and authenticate all pleadings in State of California WCAB proceeding  
 4 ADJ9981538. He will also testify to the timing of the Compromise and Release State of California  
 5 in WCAB proceeding ADJ9981538.

6 Rick Baird. Mr. Baird will testify that he was a project manager at Tesla. Mr. Baird will  
 7 also testify that he had worked with Eisenmann and Vuzem in Greenville, South Carolina when  
 8 Eisenmann provide services for BMW and in Chattanooga, Tennessee when he was also a project  
 9 manager there for Eisenmann build out of those plants including use of Vuzem workers. He will  
 10 also authenticate documents.

11 Aaron Bernay. Mr. Bernay will testify to the production of documents in the within action  
 12 and in US ex rel Lesnik. This includes the April 29, 2013 Eisenmann letter re Pages which was  
 13 attached to a declaration of Mark West of Eisenmann Corporation, and to \_ November 5, 2015  
 14 Eisenmann "Welcome Letter" Re Lesnik; the "Welcome letters" produced by Eisenmann  
 15 Corporation in February of 2020, including unsigned copy of Eisenmann Welcome letter for KP,  
 16 PP, DM (the letter transposes the first and surnames of this and other workers, DM is the correct  
 17 order for first name then surname), AP, KP, IP, KR, HV, LH, DH, BJ, MK, JK, DL, FM, PP, DH,  
 18 IV, RV; and the joint defense agreement between Eisenmann and Tesla in the within action and  
 19 in the prior civil action for damages, titled US ex rel Lesnik v Eisenmann, SE.

20 Jonathan Butler. Mr. Butler will testify to Tesla's contractual relationship with Eisenmann  
 21 in connection with work performed at the Tesla plant in Fremont, California (the "Fremont  
 22 facility"); Tesla's contractual relationship, or lack thereof, with ISM Vuzem in connection with  
 23 work performed at the Fremont facility; Tesla's role, or lack thereof, in the engagement of workers  
 24 by Eisenmann and/or ISM Vuzem for work performed at the Fremont Facility. He will also testify  
 25 about Tesla having attorneys representing it for civil litigation in 2015 and 2016 and the  
 26 knowledge that litigation gave to Tesla of facts that are indicia of coerced labor. He will also  
 27 authenticate documents.

28

1                   Greg Slettvet. Mr. Slettvet will testify to Tesla's processes for providing identification  
 2 and security badges to contractors and subcontractors who performed work at the Fremont facility;  
 3 Tesla's security and access procedures at the Fremont facility. He will also authenticate  
 4 documents.

5                   Larry Henson. Mr. Henson will testify concerning Tesla's role in work performed by  
 6 Eisenmann and/or ISM Vuzem workers at the Fremont facility and the engagement of such  
 7 workers. He will also testify to his being a project manager for prior projects with Eisenmann  
 8 including in Chattanooga, Tennessee and knowledge of Vuzem and its workers from that history.  
 9 He will also authenticate documents.

10                  Rich Schmidt. Mr. Schmidt will testify to his being project manager until fired, and his  
 11 decision to continue to hire Eisenmann and Tesla after knowledge of lack of workers comp  
 12 insurance, lack of contractors licenses, safety failures injuries to workers, and at least irregular  
 13 treatment of the Vuzem workers. Mr. Schmidt will also testify to his being a project manager for  
 14 prior projects with Eisenmann including in Chattanooga, Tennessee and knowledge of Vuzem and  
 15 its workers from that history. He will also authenticate documents.

16                  Wade Hill. Mr. Hill will testify to Tesla had the right to see and did see subcontractor  
 17 history, subcontractor contracts, insurance policies, visa information for all workers, and injury  
 18 information. This included knowing that the Vuzems did not have workers compensation or a  
 19 contractor's license, and that Eisenmann did not have a contractors' license. He will testify that  
 20 Vuzem workers were admitted as B1 visa workers, that Tesla conducted surveillance of Gregor  
 21 Lesnik, that Tesla had an incident reporting system, and that Tesla knew that multiple Vuzem  
 22 workers were injured on site and were returned to Europe without Vuzem or any workers comp  
 23 carrier paying for medical bills for care received in the United States. He will also authenticate  
 24 documents. This will be by deposition.

25                  Bobby Gonzales, Tesla Senior EHS Engineer. Mr. Gonzales will testify to his knowledge  
 26 of the work conditions at Tesla in 2015 and 2016, the injuries to Gregor Lesnik, and Tesla, Inc.'s  
 27 knowledge of the harassment, threats and coercion of individuals working for Tesla, Eisenmann,  
 28 and ISM Vuzem d.o.o. and related entities. Mr. Gonzales will testify that he was not truthful in

1 his deposition about the heavy pipes that the Vuzem workers installed. Testify that despite being  
 2 an EHS supervisor with construction experience he inaccurately stated the size and weight of the  
 3 pipes installed by Vuzem workers. He will also testify that he was on site and would have  
 4 observed work conditions. He will also testify that he spoke with Tesla's counsel Brian Maischler  
 5 in 2015 about Gregor Lesnik's fall, injuries and claim. He will also authenticate documents. Mr.  
 6 Gonzales will also testify concerning Tesla's role in work performed by Eisenmann and/or ISM  
 7 Vuzem workers at the Fremont facility; Tesla's safety procedures and records related to the  
 8 Fremont Facility. He will also authenticate documents. This will be by deposition.

9 Carlos Ramirez, former Tesla manager. Mr. Ramirez who has knowledge of the work  
 10 conditions at Tesla in 2015 and 2016, the injuries to Gregor Lesnik, and Tesla, Inc.'s knowledge  
 11 of the harassment, threats and coercion of individuals working for Tesla, Eisenmann, and ISM  
 12 Vuzem d.o.o. and related entities and of Tesla's actions to cover up safety and injury problems.  
 13 Mr. Ramirez has knowledge of documents, and of custody of documents, regarding Tesla's  
 14 knowledge, acceptance and support of harassing and intimidating conduct, failures to treat injured  
 15 workers, and misclassification of worker injuries.

16 Marc Evans. Mr. Evans will testify to the indicia of coerced labor, all of which were  
 17 present at the Tesla Fremont plant. This will be by deposition.

18 William Drewery. Mr. Drewery will testify to Tesla's contractual relationship with  
 19 Eisenmann in connection with work performed at the Fremont facility; Tesla's contractual  
 20 relationship, or lack thereof, with ISM Vuzem in connection with work performed at the Fremont  
 21 facility; Tesla's role, or lack thereof, in the engagement of workers by Eisenmann and/or ISM  
 22 Vuzem for work performed at the Fremont Facility. Mr. Drewery will testify to Tesla hiring and  
 23 paying Eisenmann, the duration of the work relationship, the continued work relationship, hiring  
 24 and payment after knowledge of indicia of coercion, and that there is nothing to indicate that  
 25 Vuzem workers were paid \$55 per hour as represented by Tesla including by its CEO. He will  
 26 also authenticate documents. This will be by deposition.

27 Robert Thomas. Mr. Thomas will testify to knowledge by Tesla of work, injury, lack of  
 28 security and lack of insurance by unlicensed, uninsured Vuzem and decision by project managers

1 to continue to hire and work with Eisenmann and Tesla despite knowledge of facts which are  
2 indicia of coerced labor; specific known injuries; and the existence of spreadsheets regarding  
3 incidents at Tesla which were not produced. He will testify that he was not told that the Vuzem  
4 workers worked at night, that that would require a safety supervisor, and there was none for night  
5 work. He will also authenticate documents. This will be by deposition.

6 Aleksandra Nelson, nee Janevska. Ms. Nelson will testify that she was produced as “that  
7 officer, director or employee(s) of defendant Tesla, Inc. most knowledgeable about” … 3) Tesla’s  
8 processes for providing identification and security badges to contractors and subcontractors who  
9 performed work at the Fremont facility; Tesla’s security and access procedures at the Fremont  
10 facility.” Ms. Nelson will testify that she is not and that she testified that she was not. Ms. Nelson  
11 will testify that she was to answers questions about “Tesla’s processes during 2014 and 2015 for  
12 providing identification and security badges to contractors who performed work at the Fremont  
13 facility; Tesla’s processes during 2014 and 2015 for providing identification and security badges  
14 to subcontractors who performed work at the Fremont facility; and What information was obtained  
15 by Tesla during 2014 and 2015 for workers who were provided identification and security badges  
16 for the Fremont facility. This includes what visa, passport or citizenship information was obtained  
17 by Tesla;” Ms. Nelson will testify that she did not have any role in these matters, and that she  
18 could recall what information, documents and process she went through when security issued her  
19 an entrance and security badge. Ms. Nelson will testify that she is from Macedonia, learned to  
20 speak Croatian prior to her moving to the United States about age 16, and that she also speaks and  
21 understands Macedonian and English. She will testify that she worked for two months in 2015 as  
22 contractor as an interpreter for the Tesla EHS department and regularly walked the construction  
23 site where the Vuzem workers including Sasa Maslic were working. She will testify that Tesla  
24 safety supervisor Gonzales’ “Weekly Highlights” for the week of 12/5/2015: “Continued to work  
25 with Aleksandra Rodriguez, Nextsource Croatian translator, as she completed her OSHA 10,  
26 OSHA 30, Fall Protection and Confined Space certifications” is not accurate, in that the Rodriguez  
27 was neither her family birth name or her last name after she was married. This will be by  
28 deposition.

1 Tara Lucier will testify concerning Tesla's contracts with Eisenmann; Eisenmann hiring a  
 2 dissolved unlicensed corporation for work at the Fremont plant; the hiring decision by the project  
 3 manager; the project managers having also worked with Eisenmann including Vuzems at other  
 4 projects out of state prior to the work at Fremont; and to the existence but non-production of  
 5 relevant documents about hiring Vuzem, knowledge of Vuzem's work and practices, and the work  
 6 conditions in Fremont. She will also authenticate documents. This will be by deposition.

7 Robert Keller, Purchasing Manager at Eisenmann Corporation. Mr. Keller will testify by  
 8 his declarations in US ex rel Lesnik of his preparation of and signature on "welcome letters" to  
 9 the US Consulate in connection with the application for B1/B2 visas for Gregor Lesnik and other  
 10 individuals who entered the United States under B1 visas.

11 Mark West, President at Eisenmann Corporation. Mr. West will testify by his declarations  
 12 in US ex rel Lesnik of his knowledge of the corporate structure of Eisenmann entities, the  
 13 agreements between Eisenmann Corporation and other Eisenmann entities, and the "Welcome  
 14 Letters" in support of B1/B2 visas.

15 Bogdan Vilcnik. Mr. Vilcnik was contracted to work at Eisenmann. He was made  
 16 Supervisor because he knew how to speak German, Croatian, English and Slovenian.

17 Gerald Greiner, pre-Covid Field Safety Manager at Holder Construction, formerly  
 18 Owner/Senior Safety Consultant for G&K Industrial Solutions LLC, 45360 Whitetail Court,  
 19 Fremont, CA 94539, Phone: (775) 230-6244. Mr. Greiner has knowledge of his work for  
 20 Eisenmann Corporation and other entities at the Volkswagen plant in Chattanooga, Tennessee  
 21 between December 2013 through 2015, at the Tesla plant in Fremont between 2015 and 2016, and  
 22 at BMW facilities in South Carolina. He also has knowledge of the lack of insurance, contractors'  
 23 licenses, and proper job site safety and health and safety standards at those sites. All claims,  
 24 notices, and responses in Cal-OSHA proceedings 1094960 and 1094936, as well as of all claims,  
 25 notices, responses and pleadings in Cal-OSHA appea 15-RID2-4360. He was interviewed by CBS  
 26 News.

27 Aljosa Grobelnik, Site Manager for Eisenmann Corporation and Supervisor at ISM  
 28 Vuzem. Mr. Grobelnik has knowledge of the work of the Vuzem entities for Eisenmann.

1           Elon Musk, Chief Executive Officer, Chairman, Product Architect and CEO at Tesla, Inc.,  
 2 formerly Tesla Motors, Inc., 3500 Deer Creek Road, Palo Alto, CA 94304. Mr. Musk has  
 3 knowledge of the finances for Tesla. He is also knowledgeable about the Tesla response to  
 4 newspaper articles about the hidden workers building the Tesla plant, and of Tesla's continued  
 5 contractual relationship(s) with Eisenmann entities. This includes the May 18, 2016 Re-Tweet by  
 6 Musk that Tesla paid \$55 per hour for the construction company's workers.

7           Aaron Langberg. Mr. Langberg will testify to the production of documents by Tesla in  
 8 US ex rel Lesnik v Eisenmann SE and by Tesla in the within actions. "Access Denied, Granted  
 9 and Other Badge Events" entry records for work at the Tesla site by the Vuzems, and their key  
 10 employees and related persons including Robert Vuzem, Mladen Gregurec, Branko Tomas, Leon  
 11 Galun (of Gregurec), Davorin Hull, Primoz Planovsek, and Krunoslav Premusic, Klemen Vuzem,  
 12 and many workers, as well Hull, Planovsek, and Premusic, on May 16, 2015, the day Gregor  
 13 Lesnik fell through the roof at the Tesla plant.

14

15           2. Witnesses Who May be Called and Who are Identified to Preserve Plaintiff's Rights  
Pursuant to the Court's Standing Orders and Orders Issued in This Action

16           Ivan Drzaic. Mr. Drzaic will testify to facts stated in his declaration attached as exhibits  
 17 E and F to the declaration of Radmilo Bozinovic, ECF # 487-3, and as alleged in the August 27,  
 18 2020 filed complaint in this action.

19           Robert Hernaus. Mr. Hernaus will testify to facts stated in his declaration attached as  
 20 exhibits G and H to the declaration of Radmilo Bozinovic, ECF # 487-3 in US ex rel Lesnik, and  
 21 as alleged in the August 27, 2020 filed complaint in this action.

22           Leopold Hubek. Mr. Hubek will testify to facts stated in his declaration attached as exhibits  
 23 I and J to the declaration of Radmilo Bozinovic, ECF # 487-3 in US ex rel Lesnik, and as alleged  
 24 in the August 27, 2020 filed complaint in this action.

25           Leon Hudoldetnjak. Mr. Hudoldetnjak will testify to facts stated in his declaration,  
 26 attached declaration of Radmilo Bozinovic, ECF # 487-3 in US ex rel Lesnik, and as alleged in  
 27 the August 27, 2020 filed complaint in this action

28

1       Elvis Koscak. Mr. Koscak will testify to facts stated in his declaration, attached declaration  
2 of Radmilo Bozinovic, ECF # 487-3 in US ex rel Lesnik, and as alleged in the August 27, 2020  
3 filed complaint in this action.

4       Gregor Lesnik. Mr. Lesnik will testify to facts stated in his declaration, attached  
5 declaration of Radmilo Bozinovic, ECF # 487-3 in US ex rel Lesnik, and as alleged in the August  
6 27, 2020 filed complaint in this action.

7       Tomica Panic. Mr. Panic will testify to facts stated in his declaration, attached declaration  
8 of Radmilo Bozinovic, ECF # 487-3 in US ex rel Lesnik, and as alleged in the August 27, 2020  
9 filed complaint in this action.

10       Mitje Pogorevc. Mr. Pogorevc will testify to facts stated in his declaration, attached  
11 declaration of Radmilo Bozinovic, ECF # 487-3 in US ex rel Lesnik, and as alleged in the August  
12 27, 2020 filed complaint in this action.

13       Zeljko Puljko. Mr. Puljko will testify to facts stated in his declaration, attached declaration  
14 of Radmilo Bozinovic, ECF # 487-3 in US ex rel Lesnik, and as alleged in the August 27, 2020  
15 filed complaint in this action.

16       David Stante. Mr. Stante will testify to facts stated in his declaration, attached declaration  
17 of Radmilo Bozinovic, ECF # 487-3 in US ex rel Lesnik, and as alleged in the August 27, 2020  
18 filed complaint in this action.

19       Danica Trifunac. Mr. Trifunac will testify to facts stated in his declaration, attached  
20 declaration of Radmilo Bozinovic, ECF # 487-3 in US ex rel Lesnik, and as alleged in the August  
21 27, 2020 filed complaint in this action.

22       Nedeljko Zivanic. Mr. Zivanic will testify to facts stated in his declaration, attached  
23 declaration of Radmilo Bozinovic, ECF # 487-3 in US ex rel Lesnik, and as alleged in the August  
24 27, 2020 filed complaint in this action.

25       Stanko Tansek. Mr. Tansek is a former worker of Gregurec who later worked for ISM  
26 Vuzem, d.o.o. Stanko Tansek has knowledge that workers for Gregurec, including those who  
27 worked later for ISM Vuzem, d.o.o., had worked in the United States several times in different  
28 states since 2000 with Eisenmann.

1 Sandi Kralj, former employee at ISM Vuzem. Mr. Kralj filed criminal charges in Republic  
 2 of Croatia Court against ISM Vuzem and Robert Vuzem for unpaid taxes. While working on a  
 3 project at the BMW factory in 2014, Mr. Kralj became ill and coughing up blood. Mr. Kralj  
 4 requested to see a doctor but ISM Vuzem refused. He wanted to book a flight to back to Croatia,  
 5 but was originally denied the same.

6 Goran Zivanic, former employee at Vuzem USA. Mr. Zivanic's leg was injured and the  
 7 supervisors of Vuzem would not allow him to go to the doctor. He self-treated his injury with  
 8 creams and pain tablets and could not return to work for 7 days. Mr. Zivanic was denied pay while  
 9 he was injured.

10 Todd Maron, General Counsel at Tesla from September 2014 to present. Mr. Maron has  
 11 knowledge of the contracts with Eisenmann entities.

12 Deepak Ahuja, Chief Financial Officer at Tesla from March 2017 to present. Mr. Ahuja  
 13 has knowledge of the finances of the enterprise as it involves Tesla and Eisenmann.

14 Darko Ceglec, Supervisor at Gregurec Ltd. Mr. Ceglec has knowledge of the relationship  
 15 between Gregurec and Eisenmann entities, the development of subcontractor / labor contractors  
 16 for Eisenmann, the work by B-1 visa workers at many sites, his directions to Stjepan Papes and  
 17 others including Primoz Uplaznik, Matevz Uplaznik, and Dean Sipek, to work at LaX Fabricating,

18

19 Defendant's Witnesses

20 **William (Will) Joseph Drewery:** Mr. Drewery will testify to the relationship between  
 21 Tesla and Eisenmann Corporation, the general contractor who hired Vuzem to work at the Tesla  
 22 paint shop project in Fremont, including but not limited to the contractual provisions, terms, and  
 23 conditions between the parties, Tesla's knowledge (or lack thereof) regarding Eisenmann's work,  
 24 Eisenmann's oversight and discretion regarding the work, and Tesla's and Eisenmann's respective  
 25 control of the project.

26 **Bobby Gonzalez:** Mr. Gonzalez will testify to the relationship between Tesla and  
 27 Eisenmann Corporation, including but not limited to the relationship between the parties, Tesla's  
 28 knowledge (or lack thereof) regarding Eisenmann's work, Eisenmann's oversight and discretion

1 regarding the work, and Tesla's and Eisenmann's respective control of the project, and the nature  
2 and progress of Vuzem's work at the paint shop.

3       **Aleksandra Janevska:** Ms. Janevska will testify concerning Tesla's role in work  
4 performed by Eisenmann Corporation, Vuzem, and other subcontractors at the Fremont paint shop  
5 project; Tesla's security processes for the paint shop project, including but not limited to access  
6 and badging procedures for the same, information received by Tesla about individuals granted  
7 access to the paint shop project facility, and entry and exit records for the paint shop project;  
8 training provided to subcontractors at the paint shop project; Tesla's safety processes and records  
9 for the paint shop project.

10       **Tara Lucier:** Ms. Lucier will testify concerning the background of the Fremont paint shop  
11 project; Tesla's procurement of and relationship with Eisenmann Corporation (and its affiliates)  
12 for work at the paint shop project; information provided by or received about Vuzem in general  
13 and in connection with its work at the Tesla paint shop project; and Eisenmann's use of other  
14 subcontractors for the Tesla paint shop project.

15       **Jeremie Hansen:** Mr. Hansen will testify to the security and safety records of Tesla for  
16 the Fremont paint shop project, including but not limited to security access and badging processes  
17 and procedures, information received by Tesla during those processes, and entry and exit records  
18 for the paint shop project site.

19       **Robert Emerson Thomas (by deposition):** Mr. Thomas will testify to Tesla's safety  
20 procedures and records for the Fremont paint shop project, as well as interactions with Vuzem  
21 entities and/or their representatives during their work on the paint shop project.

22       **Marc Evans:** Mr. Evans will testify concerning his background and work in law  
23 enforcement, including his leading and conducting human trafficking investigations and special  
24 operations; his prior work and relevant qualifications to offer opinions in this case; the  
25 circumstances of typical and legitimate instances of human trafficking; and the nature of Maslic's  
26 circumstances as inconsistent with typical and legitimate instances of human trafficking. Mr.  
27 Evans will opine that: it is highly unusual for a labor trafficking victim, as Maslic claims to be, to  
28 argue that his services as a worker were still needed by the alleged trafficker; Maslic's claim is

1 more akin to an employee that believes they were wrongfully terminated and does not resemble  
 2 the typical statement made by a human trafficking victim; Maslic had every opportunity to stay  
 3 removed from his alleged human traffickers each time he left the United States, and he did not  
 4 have to return to continue his employment with Vuzem; Maslic's pattern of employment is more  
 5 consistent with a person who is legitimately employed and has taken advantage of the employment  
 6 opportunity that provided a good financial wage; it is highly unusual for a human trafficker to  
 7 send a victim back to the victim's home country and follow up to ensure the victim receives  
 8 medical attention; the security personnel at the Tesla paint shop project did not know and could  
 9 not have known that Maslic being labor trafficked (assuming he was trafficked in the first place);  
 10 Tesla could not have prevented any alleged human trafficking Maslic experienced; Tesla could  
 11 not reasonably have been aware of prior allegations of trafficking against Vuzem; Tesla's  
 12 arrangement with Eisenmann Corporation for Vuzem's work at the Fremont project would not  
 13 have allowed Tesla to infer Maslic had been a victim of human trafficking.

14 A full explanation of Mr. Evans's opinions is provided in his Rule 26(a)(2) disclosure and report  
 15 (see exhibit list in Appendix 2 and attachment hereto).

16       **James L. Chen, M.D.:** Dr. Chen will testify concerning his medical background and  
 17 training; his prior work and relevant qualifications to offer opinions in this case; the deficiencies  
 18 in the proffered expert reports of Plaintiff's witnesses Dr. Milan Jovanovic and Dr. Ramzy  
 19 Rimawi; the nature of Maslic's injuries as not attributable to his work at the Tesla paint shop  
 20 project in Fremont; and the inability to isolate Maslic's work at the Tesla project as the cause or  
 21 source of Maslic's alleged injuries. Dr. Chen will opine that: it would not be possible that Mr.  
 22 Maslic sustained recurrent hip dislocations at work; it cannot be stated within reasonable medical  
 23 probability that Mr. Maslic's right hip osteonecrosis was caused by his work at Tesla; and Mr.  
 24 Maslic's hip degeneration most likely pre-existed prior to his working at Tesla. A full explanation  
 25 of Dr. Chen's opinions is provided in his Rule 26(a)(2) disclosure and report (see exhibit list in  
 26 Appendix 2 and attachment hereto).

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**APPENDIX 2 – EXHIBIT LIST**

Exhibit No.	Description	Purpose	Sponsor	Objections <sup>5</sup>	Response
	Exhibits from Oppo to Mtn to Dismiss in Maslic			C, D	
001	AlamedaComplaint_HG200728 66	1, 2, 3, 4, 5	RJN, Attys	A, F	
002	Alameda First Amended Complaint	1, 2, 3, 4, 5	RJN, Attys	A, F	
003	Tesla's Initial Disclosures	1, 2, 3, 4, 5	RJN, Attys	A, D, F, I	
004	Defendant Tesla's Responses to Request for Production, Set 1	1, 2, 3, 4, 5	RJN, Attys	A, D, F, I	
005	ORDER VACATING HEARING ON MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR DEFENDANT EISENMANN CORPORATION; AND GRANTING MOTION, ECF#103	2, 3, 5	RJN, Attys	B, I	
006	DEFENDANT TESLA, INC.'S OBJECTIONS AND RESPONSES TO PLAINTIFF SASA MASLIC'S INTERROGATORIES	1, 2, 3, 4, 5	RJN, Attys	A, D, F	
007	DEFENDANT TESLA, INC.'S OBJECTIONS AND RESPONSES TO PLAINTIFF SASA MASLIC'S REQUESTS FOR ADMISSION	1, 2, 3, 4, 5	RJN, Attys	A, D, F	

<sup>5</sup> Defendant Tesla lodges a standing objection to Plaintiff's exhibit list and reserves the right to make any and all further objections at trial due to Plaintiff's provision of exhibits and updates to the same after 8 p.m. Eastern Time on July 18, 2024.

Plaintiff states that it provided an essentially complete list on July 8, including where in the record in this case and in US ex rel Lesnik the documents were located. Plaintiff provided updated lists at defendant's request on July 14 and 15. Plaintiff provided a completed list that only added page line references to deposition transcripts, and specification of the attachments to the declaration of Dr. Milan Jovanovich, plus one recently received medical record and a 386 page spreadsheet and charts that Tesla did not produce until July 17. Plaintiff also provided to defendant on July 18 a certified translation of all Serbo-Croatian documents other than the recently received hip surgery report.

1	008	DEFENDANT TESLA, INC.'S OBJECTIONS AND RESPONSES TO PLAINTIFF SASA MASLIC'S SECOND SET OF REQUESTS TO PRODUCE	1, 2, 3, 4, 5	RJN, Attys	A, D, F	
2	009	Aleksandra Janevska Verification	1, 2, 3, 5	Janevska		
3	010	ORDER FOLLOWING APRIL 23, 2024 HEARING ON JOINT DISCOVERY STATEMENT	1, 2, 3, 4, 5	RJN, Attys	B, I	
4	011	SUPPLEMENTAL STATEMENT OF DEFENDANT TESLA, INC. FOLLOWING APRIL 23, 2024 HEARING ON JOINT DISCOVERY STATEMENT	1, 2, 3, 4, 5	RJN, Attys	A, I	
5	012	James Wade Hill Deposition transcript, 19:10-27:19; 43:13- 44:22; 45:6-52:25; 53:7- 56:13; 57:2-60:16; 61:15-63:5; 66:13- 77:15; 78:15-80:5; 80:13-82:11; 82:15-84:10; 84:13-85:3; 90:20-92:14; 94:22-; 96:25- 99:14; 99:22-102:14; 108:12- 111-1; 111:2-117:17, and exhibits	1, 2, 3, 4, 5	FRCP 30	H, I	
6	013	Bobby Gonzales Deposition transcript, 10:3-11:21; 72:18- 80:23; 80:12-83:13 ; 83:18- 85:14; 85:17-87:11; 87:16-93:5; 93:8-95:14; 95:24-96:14; 97:4- 100:12; 100:18-102:19; 102:23- 107:17; 108:5-110:18; 111:1- 113:17; 113:21-114:10; 114:13- 124:12; 124:20-137:6; 137:10- 137:23; 137:25-142:1; 142:10- 143:20; 147:3-152:20; 152:24- 153:16; 155:13-156:8; 156:16- 157:15; 157:18-159:9; 159:12- 163:19; 163:23-166:18; 167:21- 168:25; 170:23-172:8; 172:18- 173:19; 173:24 -176:1; 176:5- 176:13; 176:21-180:3; 180:12- 181:16; 181:17-182:13; 182:20- 182:23; 183:2-183:17; 183:20- 189:1; 154:1-155:9; 195:11- 201:23; 195:11-201:23, and exhibits	1, 2, 3, 4, 5	FRCP 30	G, H, I	

1	014	Robert Emerson Thomas Deposition transcript, 11:3-12; 12:9-13; 19:6-16; 20:8-24; 21:16-22:19; 24:6-18; 25:9-22; 26:2-19; 31:12-32:22; 34:18-35:23; 36:7-14; 37:5-38:22; 39:17-40:9; 41:10-43:8; 43:16-50:25; 51:10-15; 52:5-53:14; 53:23-58:25; 61:10-13; 62:23-64:14; 64:22-66:5; 66:12-70:9; 70:11:73:5; 73:19-76:23; 77:1-79:5; 79:24-83:24; 85:13-86:2; 86:18-88:19; 88:21-92:5; 95:19-102:16; 103:1-105:12; 105:19-107:23; 108:10-18; 109:6-24; 110:13-111:22; 112:7-15, and exhibits	1, 2, 3, 4, 5	FRCP 30	H, I	
10	015	William Joseph Drewery Deposition transcript, 27-33; 35:19-35:25; 36:16-40:25; 40; 45; 48; 52:25-56:22; 57:1-58:22; 59:5-59:18; 62:3-63:19; 67:22-72:24; 73; 74-75; 76:7-79:1; 79:10-80:15 and exhibits	1, 2, 3, 4, 5	FRCP 30	G, H, I	
14	016	Marc Evans Deposition transcript, 18:23-19:8; 20:2-22:24	1, 2, 3, 4, 5	FRCP 30	H, I	
15	017	Deposition exhibit # 3 includes depo transcript authenticating and explaining, bates TESLA-MASLIC000474, Hot Work Permit, 05/18/2015	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
18	018	Deposition exhibit # 5 includes depo transcript authenticating and explaining, bates 540, 05/20/2015 emails re Lesnik Gregor	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
21	019	Deposition exhibit # 6 includes depo transcript authenticating and explaining, bates 537, 05/20/2015 emails re Lesnik Gregor	1, 2, 3, 4, 5	FRCP 30 and deponent	A, F, H, I	
23	020	Deposition exhibit # 7 includes depo transcript authenticating and explaining, bates 542, 5/21/2015 Hot Work Permit	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
25	021	Deposition exhibit # 8 includes depo transcript authenticating and explaining, bates 565, 05/20/2015 emails re Lesnik Gregor	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	

1	022	Deposition exhibit # 11 includes depo transcript authenticating and explaining, bates 560, 05/15/2015 emails re Lesnik Gregor	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
2	023	Deposition exhibit # 12 includes depo transcript authenticating and explaining, bates 618, 05/15/2015 emails re Lesnik Gregor	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
3	024	Deposition exhibit # 15 includes depo transcript authenticating and explaining, bates 648, 05/15/2015 emails re Lesnik Gregor	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
4	025	Deposition exhibit # 17 includes depo transcript authenticating and explaining, bates 659, 05/29/2015 emails re Lesnik Gregor	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
5	026	Deposition exhibit # 18 includes depo transcript authenticating and explaining, bates 799, 06/26/2015 emails re Lesnik Gregor	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
6	027	Deposition exhibit # 19 includes depo transcript authenticating and explaining, bates 805, 06/26/2015 emails re Lesnik Gregor	1, 2, 3, 4, 5	FRCP 30 and deponent	A, F, H, I	
7	028	Deposition exhibit # 20 includes depo transcript authenticating and explaining, bates 807, 06/28/2015 emails re Lesnik Gregor	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
8	029	Deposition exhibit # 22 includes depo transcript authenticating and explaining, bates 177, 05/16/2015 emails re Lesnik Gregor	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
9	030	Deposition exhibit # 27 includes depo transcript authenticating and explaining, bates	1, 2, 3, 4, 5	FRCP 30 and deponent	A, F, H, I	
10	031	Deposition exhibit # 28 includes depo transcript authenticating and explaining, bates	1, 2, 3, 4, 5	FRCP 30 and deponent	A, F, H, I	
11	032	Deposition exhibit # 29 includes depo transcript authenticating and explaining, bates	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
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1	033	Deposition exhibit # 34 includes depo transcript authenticating and explaining, bates 907	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
2	034	Deposition exhibit # 35 includes depo transcript authenticating and explaining, bates exel 394	1, 2, 3, 4, 5	FRCP 30 and deponent	A, F, H, I	
3	035	Deposition exhibit # 46 includes depo transcript authenticating and explaining, bates exel 4539	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
4	036	Deposition exhibit # 52 includes depo transcript authenticating and explaining, bates 100	1, 2, 3, 4, 5	FRCP 30 and deponent	A, F, H, I	
5	037	Deposition exhibit # 56 includes depo transcript authenticating and explaining, bates 403	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
6	038	Deposition exhibit # 57 includes depo transcript authenticating and explaining, bates 404	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
7	039	Deposition exhibit # 58 includes depo transcript authenticating and explaining, bates 448	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
8	040	Deposition exhibit # 59 includes depo transcript authenticating and explaining, bates 418	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
9	041	Deposition exhibit # 60 includes depo transcript authenticating and explaining, bates 456	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
10	042	Deposition exhibit # 61 includes depo transcript authenticating and explaining, bates 465	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
11	043	Deposition exhibit # 66 includes depo transcript authenticating and explaining, bates 574	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
12	044	Deposition exhibit # 67 includes depo transcript authenticating and explaining, bates 578	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
13	045	Deposition exhibit # 76 includes depo transcript authenticating and explaining, bates 2165	1, 2, 3, 4, 5	FRCP 30 and deponent	A, F, H, I	
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1	046	Deposition exhibit # 77 includes depo transcript authenticating and explaining, bates 2198	1, 2, 3, 4, 5	FRCP 30 and deponent	A, F, H, I	
2	047	Deposition exhibit # 79 includes depo transcript authenticating and explaining, bates 2200	1, 2, 3, 4, 5	FRCP 30 and deponent	A, F, H, I	
3	048	Deposition exhibit # 80 includes depo transcript authenticating and explaining, bates 2212 [OMITTED BASED ON CONFIDENTIALITY DESIGNATION]	1, 2, 3, 4, 5	FRCP 30 and deponent	A, F, H, I	
4	049	Deposition exhibit # 81 includes depo transcript authenticating and explaining, bates 2201	1, 2, 3, 4, 5	FRCP 30 and deponent	A, F, H, I	
5	050	Deposition exhibit # 83 includes depo transcript authenticating and explaining, bates 2336	1, 2, 3, 4, 5	FRCP 30 and deponent	A, F, H, I	
6	051	Deposition exhibit # 84 includes depo transcript authenticating and explaining, bates 2339	1, 2, 3, 4, 5	FRCP 30 and deponent	A, F, H, I	
7	052	Deposition exhibit # 92 includes depo transcript authenticating and explaining, bates 603	1, 2, 3, 4, 5	FRCP 30 and deponent	A, F, H, I	
8	053	Deposition exhibit # 104 includes depo transcript authenticating and explaining, bates 1591	1, 2, 3, 4, 5	FRCP 30 and deponent	A, F, H, I	
9	054	Deposition exhibit # 105 includes depo transcript authenticating and explaining, bates 472	1, 2, 3, 4, 5	FRCP 30 and deponent	A, F, H, I	
10	055	Deposition exhibit # 115 includes depo transcript authenticating and explaining, bates 3767	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
11	056	Deposition exhibit # 116 includes depo transcript authenticating and explaining, bates 4162	1, 2, 3, 4, 5	FRCP 30 and deponent	A, F, H, I	
12	057	Deposition exhibit # 126 includes depo transcript authenticating and explaining, bates	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	

1	058	Deposition exhibit # 127 includes depo transcript authenticating and explaining, bates 811	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
2	059	Deposition exhibit # 128 includes depo transcript authenticating and explaining, bates 840	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
3	060	Deposition exhibit # 129 includes depo transcript authenticating and explaining, bates 872	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
4	061	Deposition exhibit # 130 includes depo transcript authenticating and explaining, bates 885	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
5	062	Deposition exhibit # 131 includes depo transcript authenticating and explaining, bates 886	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
6	063	Deposition exhibit # 132 includes depo transcript authenticating and explaining, bates 896	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
7	064	Deposition exhibit # 133 includes depo transcript authenticating and explaining, bates 902	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
8	065	Deposition exhibit # 134 includes depo transcript authenticating and explaining, bates 903	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
9	066	Deposition exhibit # 135 includes depo transcript authenticating and explaining, bates 910	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
10	067	Deposition exhibit # 136 includes depo transcript authenticating and explaining, bates excel 911	2, 3, 5	FRCP 30 and deponent	A, G, H, I	
11	068	Deposition exhibit # 137 includes depo transcript authenticating and explaining, bates 1215	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
12	069	Deposition exhibit # 138 includes depo transcript authenticating and explaining, bates 1214	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
13	070	Deposition exhibit # 139 includes depo transcript authenticating and explaining, bates 1249	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	

1	071	Deposition exhibit # 140 includes depo transcript authenticating and explaining, bates 1285	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
2	072	Deposition exhibit # 141 includes depo transcript authenticating and explaining, bates 1327	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
3	073	Deposition exhibit # 142 includes depo transcript authenticating and explaining, bates 1328	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
4	074	Deposition exhibit # 143 includes depo transcript authenticating and explaining, bates 1323	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
5	075	Deposition exhibit # 144 includes depo transcript authenticating and explaining, bates 1516	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
6	076	Deposition exhibit # 145 includes depo transcript authenticating and explaining, bates 3779	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
7	077	Deposition exhibit # 146 includes depo transcript authenticating and explaining, bates 3808	2, 3, 5	FRCP 30 and deponent	A, G, H, I	
8	078	Deposition exhibit # 147 includes depo transcript authenticating and explaining, bates 4188	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
9	079	Deposition exhibit # 148 includes depo transcript authenticating and explaining, bates 4190	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
10	080	Deposition exhibit # 149 includes depo transcript authenticating and explaining, bates 4620	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
11	081	Deposition exhibit # 150 includes depo transcript authenticating and explaining, bates 4403	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
12	082	Deposition exhibit # 151 includes depo transcript authenticating and explaining, bates 6837	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
13	083	Deposition exhibit # 161 includes depo transcript authenticating and explaining,	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	

1	084	Deposition exhibit # 165 includes depo transcript authenticating and explaining, bates 4095	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
2	085	Deposition exhibit # 166 includes depo transcript authenticating and explaining, bates 4516	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
3	086	Deposition exhibit # 168 includes depo transcript authenticating and explaining, bates 4579	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
4	087	Deposition exhibit # 170 includes depo transcript authenticating and explaining, bates 6677	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
5	088	Deposition exhibit # 172 includes depo transcript authenticating and explaining, bates 4483	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
6	089	Deposition exhibit # 173 includes depo transcript authenticating and explaining, bates 760	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
7	090	Deposition exhibit # 201 includes depo transcript authenticating and explaining, bates 3813	1, 2, 3, 4, 5	FRCP 30 and deponent	A, F, H, I	
8	091	Deposition exhibit # 301 includes depo transcript authenticating and explaining, bates 4116	1, 2, 3, 4, 5	FRCP 30 and deponent	A, F, H, I	
9	092	Deposition exhibit # 302 includes depo transcript authenticating and explaining, bates 4158	1, 2, 3, 4, 5	FRCP 30 and deponent	A, F, H, I	
10	093	Deposition exhibit # 305 includes depo transcript authenticating and explaining, bates 3819	1, 2, 3, 4, 5	FRCP 30 and deponent	A, G, H, I	
11	095	Alameda Complaint for Damages, HG15773484	2, 3, 5	RJN and Attys	D, F, I	
12	096	First Amended Complaint for Damages and Injunctive Relief	2, 3, 4,	RJN and Attys	D, F, I	
13	097	Proof of Service on Tesla Motors, Inc.	2, 5	RJN and Attys	B, F, I	
14	098	Plaintiffs Form Interrogatories, set one to Eisenmann Corp	1, 2, 3, 5	Attys	A, B, C, F, I	
15	099	Plaintiffs Form Interrogatories, set one to Eisenmann, SE	1, 2, 3, 5	Attys	A, B, C, F, I	
16	100	Plaintiffs Form Interrogatories, set one to Tesla Motors, Inc.	1, 2, 3, 5	Attys	A, B, C, F, I	

1	101	DEFENDANT TELSA MOTORS, INC. RESPONSE TO PLAINTIFF'S FORM INTERROGATORIES-GENERAL, SET ONE	1, 2, 3, 5	Attys	A, B, C, F, I	
2	103	DEFENDANT TESLA MOTORS, INC.'S RESPONSES TO PLAINTIFF'S FIRST SET OF REQUESTS TO PRODUCE	1, 2, 3, 5	Attys	A, B, C, F, I	
3	104	DEFENDANT EISENMANN CORPORATION USA'S RESPONSE TO FIRST SET OF FORM INTERROGATORIES PROPOUNDED BY PLAINTIFF GREGOR LESNIK	1, 2, 3, 5	Attys	A, B, C, F, I	
4	105	DEFENDANT TESLA MOTORS, INC.'S RESPONSE TO PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS, SET TWO	1, 2, 3, 5	Attys	A, B, C, F, I	
5	106	DEFENDANT TESLA MOTORS, INC.'S RESPONSE TO PLAINTIFF'S SPECIAL INTERROGATORIES, SET ONE	1, 2, 3, 5	Attys	A, B, C, F, I	
6	107	RESPONSE OF DEFENDANT EISENMANN CORPORATIION USA TO SECOND REQUEST FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY PLAINTIFF GKEGOH LESNIK	1, 2, 3, 5	Attys	A, B, C, F, I	
7	108	DEFENDANT TESLA MOTORS, INC.S RESPONSE TO PLAINTIFF'S REQUEST FOR PRODUTION OF DOCUMENTS, SET TWO	1, 2, 3, 5	Attys	A, B, C, F, I	
8	109	DEFENDANT TESLA MOTORS, INC.'S RESPONSE TO PLAINTIFF'S SPECIAL INTERROGATORIES, SET ONE	1, 2, 3, 5	Attys	A, B, C, F, I	
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1	110	DEFENDANT TESLA MOTORS, INC.'S SUPPLEMENTAL RESPONSES TO PLAINTIFF'S FIRST SET OF REQUESTS TO PRODUCE	1, 2, 3, 5	Attys	A, B, C, F, I	
2	111	DEFENDANT TESLA MOTORS, INC.'S SUPPLEMENTAL RESPONSES TO PLAINTIFF'S FIRST SET OF REQUESTS TO PRODUCE	1, 2, 3, 5	Attys	A, B, C, F, I	
3	112	RESPONSE OF DEFENDANT EISENmann CORPORATION USA TO FIRST REQUEST FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY PLAINTIFF GREGOR LESNIK	1, 2, 3, 5	Attys	A, B, C, F, I	
4	113	PRODUCTION OF DOCUMENTS OF EISENmann CORPORATION USA IN RESPONSE TO FIRST AND SECOND REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY PLAINTIFF GREGOR LESNIK	1, 2, 3, 4, 5	Attys	A, B, C, F, I	
5	114	DEFENDANT EISENmann SE'S RESPONSES TO PLAINTIFF GREGOR LESNIK'S REQUESTS TO PRODUCE, SET ONE	1, 2, 3, 5	Attys	A, B, C, F, I	
6	115	DEFENDANT EISENmann SE'S RESPONSES TO PLAINTIFF GREGOR LESNIK'S REQUESTS TO PRODUCE, SET ONE	1, 2, 3, 5	Attys	A, B, C, F, I	
7	116	DEFENDANT EISENmann SE'S PRODUCTION OF DOCUMENTS IN RESPONSE TO PLAINTIFF GREGOR LESNIK'S REQUESTS TO PRODUCE, SET ONE	1, 2, 3, 4, 5	Attys	A, B, C, F, I	
8	117	Deposition of Primoz Planovsek	1, 2, 3, 4, 5	Attys	G, H, I	
9	118	Order to Provide Information Under Oath	1, 2, 3, 4, 5	RJN	A, B, C, D, F, I	

1	119	Letter from attorney Gregory Grinberg to Judge Levin	1, 2, 3, 4, 5	Grinberg	A, B, C, F, I	
2	120	Reserved			I	
3	121	Declaration of William C Dresser Re License and Workers Compensation Coverage for ISM Vuzem d.o.o. and Vuzem USA, Inc. and for Eisenmann Corp and Tesla Motors, Inc.	1, 2, 3, 5	Dresser, RJN	C, D, F, I	
4	122	Order Joining Additional Parties Defendant	1, 2, 3, 5	RJN	I	
5	123	DECLARATION OF ROBERT KELLER RE: LEGAL NAME (S) AND CORPORATE STATUS OF EISENMANN ENTITIES	2, 3, 5	RJN	C, D, F, I	
6	124	DECLARATION OF AMEE A. MIKACICH IN RESPONSE TO ORDER JOINING ADDITIONAL PARTIES DEFENDANT	1, 2, 3, 5	Mikacich	C, D, F, I	
7	125	Minutes of Workers' Compensation Appeals Board, Case #9981538	1, 2, 3, 5	RJN	A, B, C, D, F, I	
8	126	Declaration of Stjepan Papes	1, 2, 3, 4, 5	Attys	A, C, F	
9	127	Deposition of Miljan Vukadinovic	1, 2, 3, 4, 5	Attys	A, C, F	
10	128	Eisenmann Subcontractor General Terms and Conditions	1, 2, 3, 4, 5	Tesla witnesses	A, C, F, G, I	
11	129	Tesla Motors and Eisenmann General Terms and Conditions for Purchase of Equipment	1, 2, 3, 4, 5	Tesla witnesses	A, F, I	
12	130	Tesla Motors and Eisenmann General Terms and Conditions for Purchase of Equipment	1, 2, 3, 4, 5	Tesla witnesses	A, F, I	
13	131	ISM Vuzem, USA and Eisenmann Corp. Purchase Order	1, 2, 3, 4, 5	Tesla witnesses	A, C, F, I	
14	132	Tesla approved Purchase Order with Eisenmann Anlagenbau TGmbH & Co.	1, 2, 3, 4, 5	Tesla witnesses	A, C, F, I	
15	133	Tesla Approved Purchase Order with Eisenmann Corporation	1, 2, 3, 4, 5	Tesla witnesses	A, C, F, I	
16	134	Tesla Motors – Eisenmann Statement of Work	1, 2, 3, 4, 5	Tesla witnesses	A, C, F, I	
17	135	Eisenmann Project Tesla – Minutes of Meeting & Technical Clarification, Minutes of Meeting	1, 2, 3, 4, 5	Tesla witnesses	A, C, F, I	

1	136	Eisenmann Project Tesla – Minutes of Meeting & Technical Clarification, Minutes of Meeting including contract	1, 2, 3, 4, 5	Tesla witnesses	A, C, F, I	
2	137	Contract No. 04-2015 between ISM Vuzem USA and ISM Vuzem d.o.o.	1, 2, 3, 4, 5	Tesla witnesses	A, C, F, I	
3	138	Contract No. 04-2015 between ISM Vuzem USA and ISM Vuzem d.o.o. without Eisenmann PO	1, 2, 3, 4, 5	Tesla witnesses	A, C, F, I	
4	139	Redacted Contract	1, 2, 3, 4, 5	Tesla witnesses	A, B, C, F, I	
5	140	DECLARATION OF RADMILO BOZINOVIC, Ph.D., REGARDING CLASS MEMBER DECLARATIONS IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION, with attached and translated declarations of employees of ISM Vuzem, d.o.o.	1, 2, 3, 4, 5	Bozinovic	B, C, I	
6	141	REQUEST FOR JUDICIAL NOTICE DOCUMENTS AND THINGS IN SUPPORT OF PLAINTIFFS AND RELATORS GREGOR LESNIK AND STJEPAN PAPES' FIRST AMENDED MOTION FOR DEFAULT JUDGMENT ON COERCED LABOR CLAIMS	1, 2, 3, 4, 5	RJN, Attys	A, B, C, D, F, I	
7	142	SUPPLEMENTAL DECLARATION OF STJEPAN PAPES IN SUPPORT OF PLAINTIFFS AND RELATORS GREGOR LESNIK AND STJEPAN PAPES' AMENDED RENEWED MOTIONS FOR DEFAULT JUDGMENTS	1, 2, 3, 4, 5	RJN, Attys, Papes	A, B, C, D, F, I	
8	143	DECLARATION OF STJEPAN PAPES IN SUPPORT OF PLAINTIFFS AND RELATORS GREGOR LESNIK AND STJEPAN PAPES RENEWED MOTIONS FOR DEFAULT JUDGMENTS	1, 2, 3, 4, 5	RJN, Attys, Papes	A, B, C, D, F, I	

1	144	Declaration of Gregor Lesnik in Support of Renewed Motions for Default Judgments	1, 2, 3, 4, 5	RJN, Attys, Lesnik	A, B, C, D, F, I	
2	145	Declaration of Danijel Travancic	1, 2, 3, 4, 5	Travancic	A, C, D, F, I	
3	146	DECLARATION OF DANIJEL TRAVANCIC RE COMPANY WORKERS AT TESLA	1, 2, 3, 4, 5	Travancic	A, C, D, F, I	
4	147	Declaration of Jack (Jay) B. Palmer Jr.	1, 2, 3, 5	Palmer	A, C, D, F, I	
5	148	Contract between ISM Vuzem USA and ISM Vuzem d.o.o.	1, 2, 3, 4, 5	Tesla witnesses	A, C, F, I	
6	149	Tesla notifying Eisenmann of its obligation under the Agreement to indemnify Tesla in connection with Lesnik v ISM Vuzem USA, Inc	1, 2, 3, 5	Tesla witnesses	A, B, C, F, I	
7	150	Vuzem proposed settlement to Eisenmann	1, 2, 3, 4, 5	Tesla witnesses	A, B, C, F, I	
8	151	Robert Vuzem email Notice regarding hourly timesheets	1, 2, 3, 4, 5	Maslic, Sincek	A, C, F, I	
9	152	Subpoena Records Macro Pro Order page	2, 4, 5	Attys	A, C, F, I	
10	153	Subpoenaed Case manager notes from Regional Medical Center of San Jose	1, 2, 3, 4, 5	Attys, Regional Medical, Cathy Tseng	A, B, C, E, F, I	
11	154	Eisenmann letter to Sasa Maslic re Visas for Employees of Co. Gregurec Ltd.	1, 2, 3, 4, 5	Attys, Tesla witnesses	A, C, F, I	
12	155	Email from Robert Vuzem to Robert Keller re Visas	1, 2, 3, 4, 5	Attys, Tesla witnesses	A, B, C, F, I	
13	156	Tesla Motors Order for ISM Vuzem USA, Inc. and Eisenmann	1, 2, 3, 4, 5	Tesla witnesses	A, B, C, F, I	
14	157	Eisenmann's Order with ISM Vuzem USA, Inc.	1, 2, 3, 4, 5	Attorneys, Tesla witnesses	A, B, C, F, I	
15	158	Eisenmann Minutes of Meeting	1, 2, 3, 4, 5	Attorneys, Tesla witnesses	A, B, C, F, I	
16	159	Tesla Order with ISM Vuzem USA, Inc. and Eisenmann	3	Tesla witnesses	A, B, C, F, I	
17	160	Eisenmann's Order with ISM Vuzem USA, Inc	3	Tesla witnesses	A, B, C, F, I	
18	161	Eisenmann's Order with ISM Vuzem USA, Inc	3	Tesla witnesses	A, B, C, F, I	
19	162	Eisenmann's second Order with ISM Vuzem USA, In	3	Tesla witnesses	A, B, C, F, I	
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1	163	Eisenmann's third Order with ISM Vuzem USA, Inc	3	Tesla witnesses	A, B, C, F, I	
2	164	Eisenmann's Order with ISM Vuzem USA, Inc	3	Tesla witnesses	A, B, C, F, I	
3	165	Tesla Order with ISM Vuzem USA, Inc. and Eisenmann	3	Tesla witnesses	A, B, C, F, I	
4	166	Tesla Order with ISM Vuzem USA, Inc. and Eisenmann	3	Tesla witnesses	A, B, C, F, I	
5	167	Tesla Order with ISM Vuzem USA, Inc. and Eisenmann	3	Tesla witnesses	A, B, C, F, I	
6	168	Email from Robert Vuzem re negotiating settlement with Gregor Lesnik	1, 2, 3, 4, 5	Attys, Tesla witnesses, Travancic	A, B, C, F, I	
7	169	Email between Robert Keller and Rick Aquino re Rates	1, 2, 3, 4, 5	Attys, Tesla witnesses	A, B, C, F, I	
8	170	Eisenmann's Order with ISM Vuzem USA, Inc	3	Tesla witnesses	A, B, C, F, I	
9	171	Eisenmann's Order with ISM Vuzem USA, Inc	3	Tesla witnesses	A, B, C, F, I	
10	172	Eisenmann's second Order with ISM Vuzem USA, Inc	3	Tesla witnesses	A, B, C, F, I	
11	173	Eisenmann's Order with ISM Vuzem USA, Inc	2, 3	Tesla witnesses	A, B, C, F, I	
12	174	Eisenmann's Order with ISM Vuzem USA, Inc	2, 3	Tesla witnesses	A, B, C, F, I	
13	175	Eisenmann's Order with ISM Vuzem USA, Inc	2, 3	Tesla witnesses	A, B, C, F, I	
14	176	Eisenmann's Order with ISM Vuzem USA, Inc	2, 3	Tesla witnesses	A, B, C, F, I	
15	177	Eisenmann's Order with ISM Vuzem USA, Inc	2, 3	Tesla witnesses	A, B, C, F, I	
16	178	Eisenmann's second Order with ISM Vuzem USA, Inc	2, 3	Tesla witnesses	A, B, C, F, I	
17	179	Eisenmann's Order with ISM Vuzem USA, Inc	2, 3	Tesla witnesses	A, B, C, F, I	
18	180	Eisenmann's Order with ISM Vuzem USA, Inc	2, 3	Tesla witnesses	A, B, C, F, I	
19	181	Eisenmann's second Order with ISM Vuzem USA, Inc	2, 3	Tesla witnesses	A, B, C, F, I	
20	182	Email from Anton Borovac to Brice Long re Antwort: ISM Vuzem invoices for Tesla project	1, 2, 3, 4, 5	Tesla witnesses	A, B, C, F, I	
21	183	Tesla Motors Order with ISM Vuzem USA and Eisenmann	1, 2, 3	Tesla witnesses	A, B, C, F, I	
22	184	Tesla Motors second Order with ISM Vuzem USA and Eisenmann	2, 3, 5	Tesla witnesses	A, B, C, F, I	

1	185	Tesla Motors third Order with ISM Vuzem USA and Eisenmann	2, 3, 5	Tesla witnesses	A, B, C, F, I	
2	186	Tesla Motors fourth Order with ISM Vuzem USA and Eisenmann	2, 3, 5	Tesla witnesses	A, B, C, F, I	
3	187	Eisenmann's Order with ISM Vuzem USA, Inc	2, 3, 5	Tesla witnesses	A, B, C, F, I	
4	188	Eisenmann's second Order with ISM Vuzem USA, Inc	2, 3, 5	Tesla witnesses	A, B, C, F, I	
5	189	Eisenmann's third Order with ISM Vuzem USA, Inc	2, 3, 5	Tesla witnesses	A, B, C, F, I	
6	190	Eisenmann's forth Order with ISM Vuzem USA, Inc	2, 3, 5	Tesla witnesses	A, B, C, F, I	
7	191	Eisenmann's fifth Order with ISM Vuzem USA, Inc	2, 3, 5	Tesla witnesses	A, B, C, F, I	
8	192	Eisenmann's sixth Order with ISM Vuzem USA, Inc	2, 3, 5	Tesla witnesses	A, B, C, F, I	
9	193	Eisenmann's seventh Order with ISM Vuzem USA, Inc	2, 3, 5	Tesla witnesses	A, B, C, F, I	
10	194	Eisenmann's eighth Order with ISM Vuzem USA, Inc	2, 3, 5	Tesla witnesses	A, B, C, F, I	
11	195	Julia Kapp re Validation of immigration status	1, 2, 3, 4, 5	Attys, Tesla witnesses	A, B, C, F, I	
12	196	ISM Vuzem USA Inc. South Carolina Articles of Incorporation	2, 3, 5	RJN	A, B, D, F, I	
13	197	ISM Vuzem USA Inc. South Carolina Certificate of Dissolution	2, 3, 5	RJN	A, B, C, D, F, I	
14	198	Vuzem USA California Articles of Incorporation of a General Stock Corporation	2, 3, 5	RJN	A, B, C, D, F, I	
15	199	Vuzem USA Inc. SI-CA	2, 3, 5	RJN	A, B, C, D, F, I	
16	200	Vuzem USA Inc. California Certificate of Dissolution	2, 3, 5	RJN	A, B, C, D, F, I	
17	201	Bosnian Passport Redacted	1, 2, 3, 4, 5	Maslic	I	
18	202	Vuzem Declaration of intent to Recruit Redacted	1, 2, 3, 4, 5	Maslic	I	
19	202-A	Vuzem Declaration of intent to Recruit Redacted in English	1, 2, 3, 4, 5	Maslic	I	
20	203	Slovenian government Notice regarding the employment contract between ISM Vuzem, d.o.o. and Sasa Maslic [redacted]	1, 2, 3, 4, 5	Maslic	I	

1	203-A	Slovenian government Notice regarding the employment contract between ISM Vuzem, d.o.o. and Sasa Maslic [redacted, English]	1, 2, 3, 4, 5	Maslic	I	
2	204	Sasa Maslic Slovenian Work Visa redacted	1, 2, 3, 4, 5	Maslic	I	
3	205	ISM Vuzem employment contract with Stiepan Papes	1, 2, 3, 4, 5	Maslic	A, B, C, F, I	
4	205-A	ISM Vuzem employment contract with Stiepan Papes, English	1, 2, 3, 4, 5	Maslic	A, B, C, F, I	
5	206	Vuzem notice of start of employment contract	1, 2, 3, 4, 5	Maslic	I	
6	206-A	Vuzem notice of start of employment contract, English	1, 2, 3, 4, 5	Maslic	I	
7	207	Sasa Maslic's US Visa Redacted	1, 2, 3, 4, 5	Maslic	I	
8	208	Tax Secretary Certificate	1, 2, 3, 4, 5	Maslic	A, B, C, F, I	
9	208-A	Tax Secretary Certificate, English	1, 2, 3, 4, 5	Maslic	A, B, C, F, I	
10	209	Sasa Maslic's Tesla Security Badge	1, 2, 3, 4, 5	Maslic	I	
11	209-A	Sasa Maslic's Tesla Security Badge, English	1, 2, 3, 4, 5	Maslic	I	
12	210	Dr. Kanlic's notice of sick leave for me	1, 2, 3, 4, 5	Maslic	I	
13	210-A	Dr. Kanlic's notice of sick leave for me, English	1, 2, 3, 4, 5	Maslic	I	
14	211	Letter from Institute for Health Insurance of Slovenia enclosing a Health Card	4	Maslic	I	
15	211-A	Letter from Institute for Health Insurance of Slovenia enclosing a Health Card, English	4	Maslic	I	
16	212	Dr. Kanlic and Vivamed's billing statement	4	Maslic	I	
17	212-A	Dr. Kanlic and Vivamed's billing statement, English	4	Maslic	I	
18	213	Health Services Receipt	4	Maslic	I	
19	214	Bank Deposit for pay from ISM Vuzem, d.o.o.	1, 2, 3, 4, 5	Maslic	I	
20	214-A	Bank Deposit for pay from ISM Vuzem, d.o.o., English	1, 2, 3, 4, 5	Maslic	I	
21	215	Bank Deposit for pay from ISM Vuzem, d.o.o.	1, 2, 3, 4, 5	Maslic	I	
22	215-A	Bank Deposit for pay from ISM Vuzem, d.o.o., English	1, 2, 3, 4, 5	Maslic	I	
23	216	Vuzem, d.o.o. letter sent to Sasa Maslic stating the termination of my employment contract	1, 2, 3, 4, 5	Maslic	I	

1	216-A	Vuzem, letter sent to me stating the termination of my employment contract, English	1, 2, 3, 4, 5	Maslic	I	
2	217	Vuzem, Termination of Employment Contract Notice	1, 2, 3, 4, 5	Maslic	I	
3	217-A	Vuzem, Termination of Employment Contract Notice, English	1, 2, 3, 4, 5	Maslic	I	
4	218	Vuzem's proposed - but never paid for- release document	1, 2, 3, 4, 5	Maslic, Sincek	I	
5	218-A	Vuzem's proposed - but never paid for- release document, English	1, 2, 3, 4, 5	Maslic, Sincek	I	
6	219	Prescription	4	Maslic	I	
7						
8	220	Request for Care Outside Bosnia, original	4	Maslic, Jovanovic	I	
9	220-A	Request for Care Outside Bosnia, English	4	Maslic, Jovanovic	I	
10						
11	222	Sasa Maslic Driver's License Redacted	1, 2, 3, 4, 5	Maslic	I	
12	223	School Certificate Redacted	1, 2, 3, 4, 5	Maslic	B, F, I	
13	223-A	School Certificate Redacted, English	1, 2, 3, 4, 5	Maslic	B, F, I	
14	224	School Certificate Redacted	1, 2, 3, 4, 5	Maslic	B, F, I	
15	224-A	School Certificate Redacted, English	1, 2, 3, 4, 5	Maslic	B, F, I	
16	225	Air Conditioning Academy	1, 2, 3, 4, 5	Maslic	B, F, I	
17	225-A	Air Conditioning Academy, English	1, 2, 3, 4, 5	Maslic	B, F, I	
18	226	BOCK Compressors Certificate	1, 2, 3, 4, 5	Maslic	B, F, I	
19	226-A	BOCK Compressors Certificate, English	1, 2, 3, 4, 5	Maslic	B, F, I	
20	227	Dismissal letter with Epacrisises from Institute of Physical Medicine	4	Maslic, Jovanovic	B, F, I	
21	227-A	Dismissal letter with Epacrisises from Institute of Physical Medicine, English	4	Maslic, Jovanovic	B, F, I	
22						
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25	251	2014_03_11_Samac_Med_Rehab	4, 5	Maslic, Jovanovic, Rimawi		
26	252	2016_05_11_Dr.Segedi_Xray	4, 5	Maslic, Jovanovic, Rimawi		
27						
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1	253	2016_05_26_Samac_Med_Rehab	4, 5	Maslic, Jovanovic, Rimawi		
2	254	2016_05_26_samac_med_rehab_notes	4, 5	Maslic, Jovanovic, Rimawi		
3	256	2016_06_08_Dr.Durdevic	4, 5	Maslic, Jovanovic, Rimawi		
4	257	2016_07_12_Dr.Gluvacevic	4, 5	Maslic, Jovanovic, Rimawi		
5	258	2021_01_01_DomSamac.Ltr	4, 5	Maslic, Jovanovic, Rimawi		
6	259	2021_01_01-2023_11_22_JZU_DomSamac_Dr.Durdevic_Dr.Paleznica	4, 5	Maslic, Jovanovic, Rimawi		
7	260	2021_09_30_Dr.Petkovic_PelvicXray	4, 5	Maslic, Jovanovic, Rimawi		
8	261	2021_11_11_Samac_Med_Rehab_FindingsandOpinions	4, 5	Maslic, Jovanovic, Rimawi		
9	262	2022_09_20_Dr.Petkovic_LumbosacralXray	4, 5	Maslic, Jovanovic, Rimawi		
10	263	2022_12_21_Dr.Petkovic_Comparison	4, 5	Maslic, Jovanovic, Rimawi		
11	264	2022_12_21_Dr.Petkovic_Comparison	4, 5	Maslic, Jovanovic, Rimawi		
12	265	2023_07_05_Dr Slobodan Lokas	4, 5	Maslic, Jovanovic, Rimawi		
13	266	2023_07_05_History & Status	4, 5	Maslic, Jovanovic, Rimawi		
14	267	2023_07_12_Operative finding	4, 5	Maslic, Jovanovic, Rimawi		
15	268	2023_07_23_DrSlobodan_DrPetkovic_Ultrasonography	4, 5	Maslic, Jovanovic, Rimawi		
16	269	2023_10_16_DrJovanovic	4, 5	Maslic, Jovanovic, Rimawi		
17	270	2024_06_06_sasa maslic otpusno pismo i karton – not yet with certified translation	4, 5	Maslic, Jovanovic, Rimawi		
18	271	Report of Dr. Milan Jovanovic	4, 5	I		

1	272	Report of Dr. Ramzy Rimawi, M.D.	4, 5		I	
2						
3	276	Transcript of deposition of Aleksandra Nelson, 8:2-12; 8:21-9:1; 10:3-12:10; 12:16-13:12; 14:19-15:2; 16:4-5; 16:9-10; 16:18-17:1; 19:24-20:8; 20:19-21:4; 21:8-14; 22:19-24; 23:12-17; 25:19-26:1; 24:5-23; 28:3-21; 30:6-7; 31:15-32:20; 32:21-34:2; 36:19-22; 38:19-21; 47:16-20; 48:9-10; 48:25-49:2; 50:21-24 and Ex. 412); 52:1-11, and Ex. 411 and 412	1, 2, 3, 4, 5	FRCP Rule 30		
4						
5	277	Transcript of deposition of Tara Lucier, 11:3-12:10; 16:21-23, 16:6-8; 21:10-22:25; 23:21-24:14; 25:4-26:23; 27:25-28:12; 29:24-31:19; 37:7-38:6; 39:19-40:1; 41:3-44:2; 45:17-48:12; 49:7-12; 51:8-13; 51:19-55:23 (and Ex. 401); 57:8-11; 59:3-18; 62:9-63:14; 65:2-5; 70:20-25; 75:4-76:1; 77:25-78:21; 79:17-80:2; 80:18-81:3; 82:9-23; 84:22-87:6; 87:23-89:2; 90:12-15; 96:21-97:10; 97:21-98:7; 98:18-99:2; 101:9-15; 102:11-22	1, 2, 3, 4, 5	FRCP Rule 30		
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19	301	Eisenmann letter re Papes which was attached to a declaration of Mark West of Eisenmann Corporation	1, 2, 3, 4, 5	Attys	C, F, I	
20						
21	302	Eisenmann press release re major deal BMW	3, 5	RJN, Attys, Tesla witnesses	C, D, F, I	
22						
23	304	dated Eisenmann-Vuzem-Minutes of Meeting.9-29-14. This was produced by Tesla, Inc. on January 26, 2016 and by Eisenmann Corporation on February 11, 2016 in response to requests to produce in Alameda County Superior Court action HG15773484.	1, 2, 3, 4, 5	Attys, Tesla witnesses	F, I	
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1	305	Eisenmann PO ISM Vuzem USA. This was produced by ISM Vuzem, d.o.o. on October 1, 2015, by Tesla, Inc. on January 26, 2016 and by Eisenmann Corporation on February 11, 2016 in response to requests to produce in Alameda County Superior Court action HG15773484. This is one of the known contract documents which in their entirety were attached as Exhibit DD to my August 9, 2018 Declaration (US rel Lesnik action, ECF # 237). Tesla finally produced additional PO, but not until April 29, 2024	1, 2, 3, 4, 5	Attys, Tesla witnesses	F, I	
11	306	Vuzem letter re Papes Deft Prod 2020_02_03	1, 2, 3, 4, 5	Attys, Tesla witnesses	F, I	
12	307	Eisenmann press release Tesla Motors	1, 2, 3, 5	RJN, Attys, Tesla witnesses	A, B, C, D, F, I	
13	308	ISM Vuzem USA Inc dissolved by South Carolina	1, 2, 3, 5	RJN	D, I	
14	310	Photo taken by me of Security Check Point Construction Gate 8 at Tesla in Fremont	1, 2, 3, 4, 5	Tesla witnesses	F, I	
15	311	Photo taken by me of Security Check Point Construction Gate 8 (security stop sign) at Tesla in Fremont	1, 2, 3, 4, 5	Tesla witnesses	F, I	
16	312	Eisenmann "Welcome Letter" Re Lesnik	1, 2, 3, 4, 5	Attys, Tesla witnesses	A, B, F, I	
17	313	Grassley Letter with attachments	1, 2, 5	RJN, Attys, Tesla witnesses	A, B, C, D, F, I	
18	314	Grassley Letter to DOJ + DHS (H-1B Fraud)	1, 2, 5	RJN, Attys, Tesla witnesses	A, B, C, D, F, I	
19	315	State Dept Statement to CBSN	1, 2, 5	RJN, Attys, Tesla witnesses	A, B, C, D, F, I	

1	316	Facebook post of then ISM Vuzem d.o.o. employee Josip Liber – subsequently HRID_Mont, d.o.o. employee - with Davorin Hull In South Carolina	1, 2, 3, 5	Attys, Travancic, Maslic, Sincek	A, B, C, F, I	
2	317	HRID-Mont d.o.o. statement that Helena Ogrizek is the Sole Partner	1, 2, 3, 5	RJN	A, B, C, D, F, I	
3	318	HRID-Mont d.o.o. Annual Report 2016 from the Kyckr / AJPES website for EU corporations	1, 2, 3, 5	RJN	A, B, C, D, F, I	
4	319	HRID-Mont d.o.o. Basic Information from required public filing	1, 2, 3, 5	RJN	A, B, C, D, F, I	
5	320	ISM Vuzem, d.o.o. Annual Reports from 2013 to 2016 from the Kyckr / AJPES website for EU corporations	1, 2, 3, 5	RJN	A, B, C, D, F, I	
6	321	HRID-Mont d.o.o. Annual Report in English from the Kyckr / AJPES website for EU corporations	1, 2, 3, 5	RJN	A, B, C, D, F, I	
7	322	Josip Liber business card in which he is now a supervisor for HRID MONT d.o.o.; the card states the same address for HRID Mont, d.o.o. as ISM Vuzem, d.o.o.'s address. Mr. Liber identified himself as an employee of ISM Vuzem, d.o.o. until late 2017	1, 2, 3, 4, 5	RJN, Maslic, Sincek	A, B, C, D, F, I	
8	323	Facebook date retrieved of HRID-Mont, d.o.o. workers at Guardian Glass	1, 2, 3, 4, 5	RJN	A, B, C, D, F, I	
9	324	Photos from google maps for HRID-Mont, d.o.o. showing the HRID-Mont, d.o.o. business address is the same building as for ISM Vuzem, d.o.o. - with the name ISM Vuzem d.o.o. on the building - and only one door	1, 2, 3, 4, 5	RJN	A, B, C, D, F, I	
10	325	HRID-Mont d.o.o. AJPES formal report stating that Helena Ogrizek is the Founder	1, 2, 3, 4, 5	RJN	A, B, C, D, F, I	
11	327	Publicly filed ISM VUZEM, d.o.o. financials	1, 2, 3, 4, 5	RJN	A, B, C, D, F, I	
12	328	publicly filed HRID Mont, d.o.o. financials	1, 2, 3, 4, 5	RJN	A, B, C, D, F, I	
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1	329	Gregurec Ltd Reg Annual Report which states among other things on page 11 that Mladen Gregurec is the Sole Shareholder	1, 2, 3, 4, 5	RJN	A, B, C, D, F, I	
2	330	Gregurec info on Endole overview tab	1, 2, 3, 4, 5	RJN	A, B, C, D, F, I	
3	331	public information on the Gov.uk Companies House website that Mladen Gregurec is identified as a Person with Significant Control	1, 2, 3, 4, 5	RJN	A, B, C, D, F, I	
4	332	identification of Gregurec, Ltd. Officers	1, 2, 3, 4, 5	RJN	A, B, C, D, F, I	
5	333	Leon Galun LinkedIn posts for 2017 and 2020 showing that he is now Managing Director of Gregurec, Ltd.	1, 2, 3, 4, 5	RJN	A, B, C, D, F, I	
6	334	print screen from Mos Servic, d.o.o. website which represents that Mos Servis, d.o.o. was at that time working at three construction sites in the US	1, 2, 3, 5	RJN	A, B, C, D, F, I	
7	335	print screen from MOS Servis, d.o.o. website representing that it was providing construction services work at VW Chattanooga, Tennessee	1, 2, 3, 5	RJN	A, B, C, D, F, I	
8	336	print screen from MOS Servis, d.o.o. website representing that it was working for Eisenmann at TESLA, Fremont, California	1, 2, 3, 5	RJN, Tesla witnesses	A, B, C, D, F, I	
9	337	Accident Report for injured We-Kr, d.o.o. worker Petar Pongracic	1, 2, 3, 4, 5	Pongracic	F, I	
10	338	Pongracic Injury Photos showing unsafe work conditions for these workers	1, 2, 3, 4, 5	Pongracic	F, I	
11	339	salary lists for November WeKr, which I received from a representative for We-Kr, d.o.o.	1, 2, 3, 4, 5	Tesla witnesses	A, B, F, I	
12	340	salary lists for December WeKr, which I received from a representative for We-Kr, d.o.o.	1, 2, 3, 4, 5	Tesla witnesses	A, B, F, I	
13	341	email to me from Maja Milec of We-Kr, d.o.o.	1, 2, 3, 5	Tesla witnesses	B, C, F, I	
14	342	Visa of workers at WeKr, d.o.o.	1, 2, 3, 5	Tesla witnesses	A, B, F, I	
15	342A	Visa of workers at WeKr, d.o.o. re-dacted	1, 2, 3, 5	Tesla witnesses	A, B, F, I	
16	343	Letter from LB Metal, d.o.o. re Visa	1, 2, 3, 5	Tesla witnesses	A, B, C, F, I	

1	344	MAGNA d.o.o. company detail	1, 2, 3, 5	RJN	A, B, D, F, I	
2	345	Facebook page of Leopold Hubek who works at Magna International and ISM Vuzem	1, 2, 3, 5	Tesla witnesses	A, B, C, F, I	
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4	346	NewsArticle regarding Human Trafficking conviction in Slovenia of ISM Vuzem, d.o.o. supervisor Krunoslav Premuzic and Translation of that article	1, 2, 3, 4, 5	RJN, Maslic, Sincke, Tesla witnesses	A, B, C, D, F, I	
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6	348	Premuzic Statement, in which he makes inaccurate statements about Gregor Lesnik's fall and injuries	1, 2, 3, 4, 5	Tesla witnesses	A, C, F, I	
7	349	Translation of inaccurate Premuzic statement. The first is a translation by a Slovenian native. The second is a translation as produced by ISM Vuzem, d.o.o. on October 1, 2015 in Alameda County Superior Court action HG15773484	1, 2, 3, 4, 5	Attys, Tesla witnesses	A, C, F, I	
8	351	Photo I took at apartment complex in Union City, California where Gregor Lesnik had been housed	1, 2, 3, 4, 5	Tesla witnesses, Travancic, Maslic	A, C, F, I	
9	352	Photo I took at apartment complex with van parked which was used to transport ISM Vuzem, d.o.o. workers to the Tesla construction site	1, 2, 3, 4, 5	Tesla witnesses, Travancic, Maslic	A, C, F, I	
10	353	2015 Transcript of deposition of ISM Vuzem, d.o.o. supervisor Planovsec in which he testifies that Premuzic was a supervisor	1, 2, 3, 4, 5	Attys, Tesla witnesses	A, B, C, F, I	
11	355	Vuzem employee Vukadinovic's Tesla security pass badge. This was shown to me at his deposition	1, 2, 3, 4, 5	Attys, Tesla witnesses	A, B, C, F, I	
12	356	proposed Settlement that Vuzem gave to Eisenmann	1, 2, 3, 4, 5	Attys, Tesla witnesses	A, B, C, F, I	
13	357	Photo of Workers getting into van in the dark	1, 2, 3, 4, 5	Tesla witnesses, Travancic, Maslic	A, B, C, F, I	
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1	358	Re-Tweet by Musk that Tesla paid \$55 per hour for the construction company's workers	1, 2, 3, 4, 5	Tesla witnesses	A, B, C, F, I	
2	361	screen shots from CBSN On Assignment show	1, 2, 3, 4, 5	RJN, Palmer	A, B, C, D, F, I	
3	362	Internet article accompanying CBSN On Assignment television broadcast, including statements that safety supervisor Gerald Greiner realized that European workers made less money, 'Made in America-- How the U.S auto industry was built with foreign labor'	1, 2, 3, 4, 5	RJN, Palmer	A, B, C, D, F, I	
4	363	Bojan Article in Slovenian News	1, 2, 3, 4, 5	RJN, Palmer	A, B, C, D, F, I	
5	364	Coroner releases preliminary cause of death for man killed in paint shop at BMW	1, 2, 3, 4, 5	RJN, Palmer	A, B, C, D, F, I	
6	365	South Carolina BMW Paint Shop gets cited after fatal head wound	1, 2, 3, 4, 5	RJN, Palmer	A, B, C, D, F, I	
7	366	Photo of Davorin Hull	1, 2, 3, 5	Tesla witnesses, Travancic	A, B, C, F, I	
8	367	Deposition transcripts of Miljan Vukadinovic	1, 2, 3, 4, 5	Attys	F, G, H, I	
9	368	JOINT REQUEST FOR DISMISSAL WITHOUT PREJUDICE OF CLASS ALLEGATIONS OF THE SECOND AMENDED COMPLAINT PURSUANT TO STIPULATION	1, 2, 3, 4, 5	Attys	B, I	
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1	369A	Eisenmann bates 000228, being an April 24, 2013 dated “Welcome Letter” by Eisenmann for application for B1-B2 visa for an individual who was then a construction worker and is now the Managing Director of Gregurec, Ltd. This copy is redacted as to a name (and address). For this, and all successive documents in this group of exhibits, an unredacted copy is attached to the April 5, 2021 Under Seal Dresser Declaration in the US rel Lesnik action	1, 2, 3, 5	Tesla witnesses	A, C, F, I	
10	370A	Eisenmann bates 000279, being an April 24, 2013 dated “Welcome Letter” by Eisenmann for application for B1-B2 visas for a Gregurc, Ltd worker, who is discussed in the March 29, 2021 executed declaration of Stjepan Papes at paragraphs 162 to 164;	1, 2, 3, 5	Tesla witnesses	A, C, F, I	
15	371A	Eisenmann bates 000310, being a “Welcome letter” signed by Branko Tomas as manager of ISM Vuzem USA, "business partner" of ISM Vuzem, d.o.o., redacted as to a name. The letter inaccurately identifies the proposed recipient of the visa. The individual is discussed in the April 2, 201 executed declaration of Gregor Lesnik at paragraphs and in the February 2020 filed declaration of Danijel Travancic (ECF 464) at paragraphs 8 to 11 and 14 through 22. This is one of several letters signed by Branko Tomas produced by Eisenmann Corporation; and	1, 2, 3, 5	Tesla witnesses	A, C, F, I	

1	372	Eisenmann bates 000257, being a February 9, 2015 dated Welcome letter signed by Branko Tomas, as manager of ISM Vuzem USA, "business partner" of ISM Vuzem, d.o.o., for an application for the non- competition based B1-B2 visa for Stjepan Pages. Eisenmann Corporation has for this Welcome letter withdrawn the designation of Confidentiality under this Court's STIPULATED PROTECTIVE ORDER FOR LITIGATION INVOLVING HIGHLY SENSITIVE CONFIDENTIAL INFORMATION AND TRADE SECRETS AS MODIFIED BY THE COURT (US rel Lesnik action ECF # 454). Neither this office nor Mr. Pages had received a copy of this letter prior to its production by Eisenmann Corporation.	1, 2, 3, 5	Tesla witnesses	A, C, F, I	
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16	377	TESLA000925-931, being a seven-page excerpt of "Access Denied, Granted and Other Badge Events" digital record of May 16, 2015. This shows a more complete identification of ISM Vuzem, d.o.o. identified employees for the date when Gregor Lesnik fell, and includes three entries by Stjepan Pages.	1, 2, 3, 5	Tesla witnesses	A, C, F, I	
21	378A	ENUSA000223, unsigned copy of Eisenmann Welcome letter for KP	1, 2, 3, 5	Tesla witnesses	A, C, F, I	
23	379A	ENUSA000246, unsigned copy of Eisenmann Welcome letter for PP	1, 2, 3, 5	Tesla witnesses	A, C, F, I	
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1	380A	ENUSA000252, signed copy of Branko Tomas as manager of ISM VUZEM USA Welcome letter for DM (the letter transposes the first and surnames of this and other workers, DM is the correct order for first name then surname, all subsequent identifications use the correct order for first name then surname)	1, 2, 3, 5	Tesla witnesses	A, C, F, I	
2	381A	ENUSA000261, signed copy of Branko Tomas as manager of ISM VUZEM USA Welcome letter for AP	1, 2, 3, 5	Tesla witnesses	A, C, F, I	
3	382A	ENUSA000264, signed copy of Branko Tomas as manager of ISM VUZEM USA Welcome letter for PP	1, 2, 3, 5	Tesla witnesses	A, C, F, I	
4	383A	ENUSA000266, signed copy of Branko Tomas as manager of ISM VUZEM USA Welcome letter for IP	1, 2, 3, 5	Tesla witnesses	A, C, F, I	
5	384A	ENUSA000268, signed copy of Branko Tomas as manager of ISM VUZEM USA Welcome letter for KR	1, 2, 3, 5	Tesla witnesses	A, C, F, I	
6	385A	ENUSA000289, signed copy of Branko Tomas as manager of ISM VUZEM USA Welcome letter for HV. The phrase Visum Details is stamped on the top right, which translated from German means Visa Details. The phrase PBC Robert Vuzem is stamped on the top right. In accounting, "PBC" means Provided by Client, being information and supporting documents to complete an audit. "25.05.2016" is also stamped on the top right. The letter is dated November 5, 2014	1, 2, 3, 5	Tesla witnesses	A, C, F, I	
7	386A	ENUSA000297, signed copy of Branko Tomas as manager of ISM VUZEM USA Welcome letter for LH	1, 2, 3, 5	Tesla witnesses	A, C, F, I	

1	387A	ENUSA000298, signed copy of Branko Tomas as manager of ISM VUZEM USA Welcome letter for DH	1, 2, 3, 5	Tesla witnesses	A, C, F, I	
2	388A	ENUSA000303, signed copy of Branko Tomas as manager of ISM VUZEM USA Welcome letter for BJ	1, 2, 3, 5	Tesla witnesses	A, C, F, I	
3	389A	ENUSA000305, signed copy of Branko Tomas as manager of ISM VUZEM USA Welcome letter for MK	1, 2, 3, 5	Tesla witnesses	A, C, F, I	
4	390A	ENUSA000314, signed copy of Branko Tomas as manager of ISM VUZEM USA Welcome letter for JK	1, 2, 3, 5	Tesla witnesses	A, C, F, I	
5	391A	ENUSA000319, signed copy of Branko Tomas as manager of ISM VUZEM USA Welcome letter for DL	1, 2, 3, 5	Tesla witnesses	A, C, F, I	
6	392A	ENUSA000322, signed copy of Eisenmann Welcome letter for FM with "Visum Details", "PBC Robert Vuzem", and "25.05.2016" stamped on the top right, letter being dated Feb. 05, 2014	1, 2, 3, 5	Tesla witnesses	A, C, F, I	
7	393A	ENUSA000327, unsigned copy of Eisenmann Welcome letter for PP	1, 2, 3, 5	Tesla witnesses	A, C, F, I	
8	394A	ENUSA000331, unsigned copy of Eisenmann Welcome letter for DH	1, 2, 3, 5	Tesla witnesses	A, C, F, I	
9	395	ENUSA000490, unsigned copy of Eisenmann Welcome letter for IV. The letter is dated Jan. 13, 2014	1, 2, 3, 5	Tesla witnesses	A, C, F, I	
10	396	ENUSA000490, unsigned copy of Eisenmann Welcome letter for RV. The letter is dated Jan. 2, 2014	1, 2, 3, 5	Tesla witnesses	A, C, F, I	
11	397A	Visa issued June 1, 2015 for a Vuzem employee	1, 2, 3, 5	Tesla witnesses	A, B, C, F, I	
12	398A	Visa issued June 26, 2015 for a Vuzem employee	1, 2, 3, 5	Tesla witnesses	A, B, C, F, I	
13	399A	Visa issued September 27, 2011 for a Vuzem management individual	1, 2, 3, 5	Tesla witnesses	A, B, C, F, I	
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1		Exhibits from 2015 Dresser Declaration, which were also included in RJD in US ex rel Lesnik and Maslic		D, I	
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3	401	Workers Comp Coverage Inquiry re ISM Vuzem	1, 2, 3, 5	RJD	A, B, C, D, F, I
4	402	Workers Comp Coverage Inquiry re Vuzem	1, 2, 3, 5	RJD	A, B, C, D, F, I
5	403	Workers Comp Coverage Inquiry re Vuzem USA	1, 2, 3, 5	RJD	A, B, C, D, F, I
6	404	Contractor State License Board Search re Eisenmann	1, 2, 3, 5	RJD	A, B, C, D, F, I
7	405	Contractor State License Board Search re Tesla Motors, Inc.	1, 2, 3, 5	RJD	A, B, C, D, F, I
8	406	Contractor State License Board Search Details re Tesla Motors, Inc.	1, 2, 3, 5	RJD	A, B, C, D, F, I
9	407	Contractor State License Board Search re Tesla Motors, Inc. Personnel	1, 2, 3, 5	RJD	A, B, C, D, F, I
10	408	Contractor State License Board Search re Tesla Motors, Inc. Personnel Details	1, 2, 3, 5	RJD	A, B, C, D, F, I
11	409	Contractor State License Board Search re Tesla Motors, Inc. Personnel List	1, 2, 3, 5	RJD	A, B, C, D, F, I
12	410	Contractor State License Board Search re Tesla Motors, Inc. Surety Company information	1, 2, 3, 5	RJD	A, B, C, D, F, I
13	411	Contractor State License Board Search re Tesla Motors, Inc. Workers Comp Details	1, 2, 3, 5	RJD	A, B, C, D, F, I
14	412	Contractor State License Board Search re Tesla Motors, Inc. Workers Comp History	1, 2, 3, 5	RJD	A, B, C, D, F, I
15	413	Contractor State License Board Search re Vuzem USA	1, 2, 3, 5	RJD	A, B, C, D, F, I
16	414	Contractor State License Board Search re Vuzem USA details	1, 2, 3, 5	RJD	A, B, C, D, F, I
17	415	Contractor State License Board Search re Vuzem USA License details	1, 2, 3, 5	RJD	A, B, C, D, F, I
18	416	Contractor State License Board Search re Vuzem USA Personnel	1, 2, 3, 5	RJD	A, B, C, D, F, I
19	417	Contractor State License Board Search re Vuzem USA Workers Comp details	1, 2, 3, 5	RJD	A, B, C, D, F, I
20	418	Contractor State License Board Search re Vuzem USA Workers Comp details page 2	1, 2, 3, 5	RJD	A, B, C, D, F, I

1	419	Contractor State License Board Search re Vuzem USA Workers Comp History	1, 2, 3, 5	RJN	A, B, C, D, F, I	
2	420	Workers Comp Coverage information re Vuzem	1, 2, 3, 5	RJN	A, B, C, D, F, I	
3	421	Workers Comp Coverage information re Vuzem USA	1, 2, 3, 5	RJN	A, B, C, D, F, I	
4	422	Declaration of William Dresser Re License and Workers Compensation Coverage for ISM Vuzem d.o.o. and Vuzem USA, Inc. and for Eisenmann Corp and Tesla Motors, Inc.	1, 2, 3, 5	RJN	A, C, D, E, F, I	
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6		Exhibits from April 8, 2021 Papes Declaration, US ex rel Lesnik ECF # 563, except for exhibits 102 to 106			A, C, D, E, F, I	
7	423	ISM Vuzem, d.o.o. pay records for Stjepan Papes	1, 2, 3, 4, 5	Papes, Travancic, Attys	A, C, E, F, I	
8	424	ISM Vuzem, d.o.o. Pay Summary for Stjepan Papes	1, 2, 3, 4, 5	Papes, Travancic, Attys	A, C, E, F, I	
9	425	ISM Vuzem, d.o.o. calculation of pay for Stjepan Papes as nonresident of Slovenia	1, 2, 3, 4, 5	Papes, Travancic, Attys	A, C, E, F, I	
10	426	BMW site list of workers for ISM Vuzem, d.o.o. workers, stated to be for Gregurec, and Hours worked, for workers under supervisor, signed copy received from one supervisor for one group of ISM Vuzem, d.o.o. workers	1, 2, 3, 4, 5	Papes, Travancic, Attys, Tesla witnesses	A, C, E, F, I	
11	427	Partial List of ISM Vuzem, d.o.o. workers at BMW site, Received from former Supervisor	1, 2, 3, 4, 5	Papes, Travancic, Attys, Tesla witnesses	A, C, E, F, I	
12	428	BMW site list of workers for ISM Vuzem, d.o.o. workers, now stated to be for “ISM BMW USA Ovens”, and hours worked, for “monat” workers under supervisor, signed copy received from one supervisor for one group of ISM Vuzem, d.o.o. workers	1, 2, 3, 4, 5	Papes, Travancic, Attys, Tesla witnesses	A, C, E, F, I	
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1	429	ISM Vuzem, d.o.o. pay records for Stjepan Papes	1, 2, 3, 4, 5	Papes, Travancic, Attys, Tesla witnesses	A, C, E, F, I	
2	430	ISM calculation of pay for Stjepan Papes as non-resident of Slovenia	1, 2, 3, 4, 5	Papes, Travancic, Attys, Tesla witnesses	A, C, E, F, I	
3	431	Tesla Steelwork subgroup Vuzem Report to Eisenmann - photo from former worker	1, 2, 3, 4, 5	Papes, Travancic, Attys, Tesla witnesses	A, C, E, F, I	
4	432	ISM Vuzem, d.o.o. Pay Stubs Papes	1, 2, 3, 4, 5	Papes, Travancic, Attys, Tesla witnesses	A, C, E, F, I	
5	433	Tesla Piping subgroup Vuzem Report to Eisenmann	1, 2, 3, 4, 5	Papes, Travancic, Attys, Tesla witnesses	A, C, E, F, I	
6	434	Tesla Demontage subgroup Vuzem Report to Eisenmann	1, 2, 3, 4, 5	Papes, Travancic, Attys, Tesla witnesses	A, C, E, F, I	
7	435	Tesla Piping subgroup Vuzem Report to Eisenmann	1, 2, 3, 4, 5	Papes, Travancic, Attys, Tesla witnesses	A, C, E, F, I	
8	436	ISM Vuzem, d.o.o. calculation of pay for Stjepan Papes as nonresident of Slovenia	1, 2, 3, 4, 5	Papes, Travancic, Attys, Tesla witnesses	A, C, E, F, I	
9	437	ISM Vuzem, d.o.o. Employee Payment Summary for Stjepan Papes	1, 2, 3, 4, 5	Papes, Travancic, Attys, Tesla witnesses	A, C, E, F, I	
10	438	ISM Vuzem, d.o.o. calculation of pay for Stjepan Papes as nonresident of Slovenia	1, 2, 3, 4, 5	Papes, Travancic, Attys, Tesla witnesses	A, C, E, F, I	
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1	439	ISM Vuzem, d.o.o. Pay Summary Pages as non-resident of Slovenia	1, 2, 3, 4, 5	Papes, Travancic, Attys, Tesla witnesses	A, C, E, F, I	
2	440	Murathbegovic handwritten Monthly Time Records	1, 2, 3, 4, 5	Papes, Travancic, Attys, Tesla witnesses	A, C, E, F, I	
3	441	Musk statement that Tesla Paid \$55 per hour.	1, 2, 3, 4, 5	Tesla witnesses	A, B, C, F, I	
4	442	Employee Payment Summary for Stanislav Petrovic received by Odvetnik Marjan Aleksic from attorneys for the Vuzems.	1, 2, 3, 4, 5	Attys, Tesla witnesses	A, B, C, F, I	
5	443	e-mail from Robert Vuzem to supervisors directing that they do not tell employees their hours worked.	1, 2, 3, 4, 5	Attys, Tesla witnesses	A, C, F, I	
6	444	Copy of a passport that was cancelled for a former ISM Vuzem, d.o.o. worker. issued Josip Kunej Canceled Visa	1, 2, 3, 4, 5		A, B, C, F, I	
7	445	flight ticket for me for a flight that I was not allowed to board for.	1, 2, 3, 4, 5	Papes	A, B, C, F, I	
8	446	Employment Contract of ISM Vuzem, d.o.o. of Stjepan Papes	1, 2, 3, 4, 5	Papes	A, B, C, F, I	
9	447	Employment Certificate of ISM Vuzem, d.o.o. of Stjepan Papes	1, 2, 3, 4, 5	Papes	A, B, C, F, I	
10	448	Certificate Of Last Day of Employment by ISM Vuzem, d.o.o. of Stjepan Papes	1, 2, 3, 4, 5	Papes	A, B, C, F, I	
11	449	Photo sent to me by a former co-worker at Tesla showing Unsafe Position on scaffolding	1, 2, 3, 4, 5	Maslic, Tesla witnesses	C, F, I	
12	450	Photo sent to me by a former co-worker at Tesla showing At Tesla Unsafe Position Standing on Pipe	1, 2, 3, 4, 5	Maslic, Tesla witnesses	C, F, I	
13	451	Photo sent to me by a former co-worker at Tesla showing Workers Symbolizing Jail Names On Wall	1, 2, 3, 4, 5	Maslic, Tesla witnesses	C, F, I	
14	452	One of a dozen medical reports about my medical condition, this by Doktor Alan Jelic of the Magdalena Medical Clinic.	4	Maslic, Jovanovic	C, F, I	
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	Exhibits from April 8, 2021 Lesnik Declaration, US ex re Lesnik ECF # 563-1, except exhibit 206			A, B, C, F, I	
453	Employment contract that ISM Vuzem, d.o.o. gave to Lesnik to sign	1, 2, 3, 4, 5	Attys, Tesla witnesses	A, B, C, F, I	
454	Photo of Lesnik with Danijel Travancic outside the apartment in Union City before work at the Tesla construction site	1, 2, 3, 4, 5	Travancic	A, B, C, E, F, I	
455	reports of the earliest of many X-Rays that were taken of me. This includes for a large fracture of my left femur that caused me to have Deep Vein Thrombosis. This DVT is one of the reasons why if the Vuzem trickery to put me on a plane had occurred I could have died.	1, 2, 3, 4, 5	San Jose Regional, Travancic	A, C, E, F, I	
456	(approximate date) photo of me at the hospital in San Jose showing injury to my face	1, 2, 3, 4, 5	San Jose Regional, Travancic	A, C, E, F, I	
457	photo of me at the hospital in San Jose with Danijel Travancic	1, 2, 3, 4, 5	San Jose Regional, Travancic	A, C, E, F, I	
	Note: Lesnik Decl, Ex. 206 omitted here, is Maslic trial exhibit				
458	copy of Social Worker Notes in my hospital records file summarizing the conversation that Valentino (I understand his last name to be Primiko) had with social worker Ms. Tseng	1, 2, 3, 4, 5	San Jose Regional, Travancic, Tseng	A, C, E, F, I	
459	notes in my hospital file summarizing Mr. Planovsek going to the hospital after the accident to get me released	1, 2, 3, 4, 5	San Jose Regional, Travancic, Tseng	A, C, E, F, I	
460	photo from a co-worker of about this date showing the ladder placement at the Tesla work site. At about the time when I received these photos, my co-workers were threatened and did not come by to see me	1, 2, 3, 4, 5	Tesla witnesses, Maslic, Sincek	A, C, E, F, I	
461	photo from a co-worker showing scaffolding over a bridge	1, 2, 3, 4, 5	Tesla witnesses, Maslic, Sincek	A, C, E, F, I	

1	462	photo from a co-worker showing scaffolding over a bridge with a view toward the roof showing where I fell from	1, 2, 3, 4, 5	Tesla witnesses, Maslic, Sincek	A, C, E, F, I	
2	463	photo from a co-worker showing scaffolding over with a side view	1, 2, 3, 4, 5	Tesla witnesses, Maslic, Sincek	A, C, E, F, I	
3	464	photo from a co-worker showing scaffolding with electrical cords hanging down	1, 2, 3, 4, 5	Tesla witnesses, Maslic, Sincek	A, C, E, F, I	
4	465	photo from a co-worker showing a worker in a shaft. The workers in fact had to work at times in that shaft	1, 2, 3, 4, 5	Tesla witnesses, Maslic, Sincek	A, C, E, F, I	
5	466	photo from a co-worker showing workers holding up a large pipe while standing on a scaffold, while welding was going on, with none of them given a safety visor	1, 2, 3, 4, 5	Tesla witnesses, Maslic, Sincek	A, C, E, F, I	
6	467	letter from ISM Vuzem, d.o.o. to me demanding that I see a doctor in Slovenia. This was one month after the fall, while I was still receiving medical care in San Jose	1, 2, 3, 4, 5	Attys, Tesla witnesses	A, C, E, F, I	
7	468	Social Worker Notes of conversation with Valentino	1, 2, 3, 4, 5	San Jose Regional, Travancic, Tseng	A, B, C, E, F, I	
8	469	photo of me with my baby. This was as soon as I returned home	1, 2, 3, 4, 5	Travancic	A, B, F, I	
9	470	letter from ISM Vuzem, d.o.o. stating that they would fire me. This was the first time they notified me that I was fired. The second time that they sent me a letter that I was being fired was in 2017.	1, 2, 3, 4, 5	Attys, Tesla witnesses	A, F, I	
10	471	(print screen of a) letter from Eisenmann to Tesla. This was on the internet. This was after an article in the San Jose Mercury News. This was also after a settlement between me and Eisenmann and Tesla. This bothered me.	1, 2, 3, 4, 5	Tesla witnesses	A, B, C, F, I	
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1	472	a print screen of a CBSN photo of workers getting into a van. This is what I had to do when working at the Tesla construction site - get up before the sun came up to get into a van to drive directly to the work site	1, 2, 3, 4, 5	RJN, Tesla witnesses, Palmer	A, B, C, D, F, I	
2	473	copy of the Celju summary of my statement when I went to an interrogation room because Ivan Vuzem made a complaint to the Police	1, 2, 3, 4, 5	RJN, Lesnik, Attys	A, B, C, D, F, I	
3	474	letter from the Celju law enforcement stating that the court had dismissed the Vuzem Criminal Complaint against me	1, 2, 3, 4, 5	RJN, Lesnik, Attys	A, B, C, D, F, I	
4	475	ISM Vuzem, d.o.o. letters by Ivan Vuzem to me about Sick Leave and being on time for work	1, 2, 3, 4, 5	RJN, Lesnik, Attys	A, B, C, D, F, I	
5	476	ISM Vuzem, d.o.o. statement to Workers Comp of their statement of wages	1, 2, 3, 4, 5	Attys	A, B, C, F, I	
6	477	Tesla Attendance Roster for Bobby Gonzales. This was not given to me. I was received by my lawyer. It shows that workers from other companies were in the same meetings as I was. There were other meetings with many workers from countries other than the United States who were working doing construction work at the Tesla site	1, 2, 3, 4, 5	Tesla witnesses	A, B, F, I	
7	478	B1-B2 visa for me	1, 2, 3, 4, 5	Tesla witnesses	A, B, C, F, I	
8	479	Eisenmann letter to Tesla about the article of the San Jose Mercury News Hidden Workforce Tesla Factory.	1, 2, 3, 4, 5	Tesla witnesses	A, B, C, F, I	
9	480	Reserve			I	
10		Exhibit 206 from April 2021 Declaration of Lesnik			A, B, C, D, F, I	
11	481	Photo of me at the hospital in San Jose showing injury to the left side of my body	1, 2, 3, 4, 5	Travancic	A, E, F, I	
12	482	Reserve			I	
13		Exhibits from April 2021 Pages Decl, exhibits 102 to 106			A, C, F, I	

1	483	Mercedes Benz job site Security Card for Stjepan Papes, COMPANY: Eisenmann, CONTRACTOR;	1, 2, 3, 4, 5	Attys, Tesla witnesses	A, B, F, I	
2	484	issued BMW Project Expansion Site Pass for Stjepan Papes, ISM Vuzem, d.o.o., expires 2/8/2015	1, 2, 3, 4, 5	Attys, Tesla witnesses	A, B, F, I	
3	485	issued Tesla Security Contractor Safety Card for Stjepan Papes, Company ISM Vuzem.	1, 2, 3, 4, 5	Attys, Tesla witnesses	A, B, F, I	
4	486	Papes hand written statement given to ISM Vuzem, d.o.o. of what I saw when Gregor Lesnik fell.	1, 2, 3, 4, 5	Attys, Tesla witnesses	A, B, C, F, I	
5	487	letter from the Republika Slovenija Ministrstvo za Finance to me	1, 2, 3, 4, 5	RJN, Attys	A, B, C, D, F, I	
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7	488	Reserve			I	
8		Declarations attached as exhibits to April 23, 2020 Bozinovic Declaration, US ex rel Lesnik ECF # 487-3	1, 2, 3, 4, 5		A, B, C, F, I	
9	489	DECLARATION OF KRISTIJAN ANTALASIC IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovic, witness	A, B, C, F, I	
10	489A	Serbo-Croatian DECLARATION OF KRISTIJAN ANTALASIC IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovic, witness	A, B, C, F, I	
11	490	SIFET DIZDAREVIC IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovic, witness	A, B, C, F, I	
12	490A	CROATIAN DECLARATION OF SIFET DIZDAREVIC IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovic, witness	A, B, C, F, I	
13	491	DECLARATION OF IVAN DRZAIC IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovic, witness	A, B, C, F, I	
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1	491A	CROATIAN DECLARATION OF IVAN DRZAIC IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
2	492	DECLARATION OF ROBERT HERNAUS IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
3	492A	CROATIAN DECLARATION OF ROBERT HERNAUS IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
4	493	DECLARATION OF LEOPOLD HUBEK IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
5	493A	CROATIAN DECLARATION OF LEOPOLD HUBEK IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
6	494	DECLARATION OF DAVOR HUDIN IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
7	494A	CROATIAN DECLARATION OF DAVOR HUDIN IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
8	495	DECLARATION OF LEON HUDOLDETNJAK IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
9	495A	CROATIAN DECLARATION OF LEON HUDOLDETNJAK IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
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1	496	DECLARATION OF ELVIS KOSCAK IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninović, witness	A, B, C, F, I	
2	496A	CROATIAN DECLARATION OF ELVIS KOSCAK IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninović, witness	A, B, C, F, I	
3	497	DECLARATION OF MARIJAN LAZAR IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninović, witness	A, B, C, F, I	
4	497A	CROATIAN DECLARATION OF MARIJAN LAZAR IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninović, witness	A, B, C, F, I	
5	498	DECLARATION OF GREGOR LEŠNIK IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninović, witness	A, B, C, F, I	
6	498A	CROATIAN DECLARATION OF GREGOR LEŠNIK IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninović, witness	A, B, C, F, I	
7	499	DECLARATION OF VJERAN LONČAR IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninović, witness	A, B, C, F, I	
8	499A	CROATIAN DECLARATION OF VJERAN LONČAR IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninović, witness	A, B, C, F, I	
9	500	DECLARATION OF SAŠA MASLIC IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninović, witness	A, B, C, F, I	
10	500A	CROATIAN DECLARATION OF SAŠA MASLIC IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninović, witness	A, B, C, F, I	
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1	501	DECLARATION OF TOMICA PANIC IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
2	501A	CROATIAN DECLARATION OF TOMICA PANIC IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
3	502	DECLARATION OF STJEPAN PAPES IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
4	502A	CROATIAN DECLARATION OF STJEPAN PAPES IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
5	503	DECLARATION OF ŽELJKO PULJKO IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
6	503A	CROATIAN DECLARATION OF ŽELJKO PULJKO IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
7	504	DECLARATION OF KRISTIJAN RUGANI IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
8	504A	CROATIAN DECLARATION OF KRISTIJAN RUGANI IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
9	505	DECLARATION OF DARKO SINCEK IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
10	505A	CROATIAN DECLARATION OF DARKO SINCEK IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
11	506	DECLARATION OF DAVID ŠANTE IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
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1	506A	CROATIAN DECLARATION OF DAVID ŠANTE IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
2	507	DECLARATION OF NEDELJKO ŽIVANIĆ IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
3	507A	CROATIAN DECLARATION OF NEDELJKO ŽIVANIĆ IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
4	508	DECLARATION OF KRUNOSLAV RUGANI IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
5	508A	CROATIAN DECLARATION OF KRUNOSLAV RUGANI IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION	1, 2, 3, 4, 5	Bozninovi c, witness	A, B, C, F, I	
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7		Branko Tomas Linked in	1, 2, 3, 5	RJN	D, I	
8		Declaration of Gogo Rebic with translation	1, 2, 3, 4, 5	Attys, Travancic	A, B, C, F, I	
9		Declaration of Zivanic Nediljko with translation	1, 2, 3, 4, 5	Attys	A, B, C, F, I	
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11		ORDER GRANTING IN PART AND DENYING PLAINTIFFS' THIRD MOTION FOR DEFAULT JUDGMENT AS TO TRAFFICKING VICTIMS' PROTECTION REAUTHORIZATION ACT CLAIM	1, 2, 3, 4, 5	Attys	A, F, I	
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25	601	04/11/2014 Invoice 007302	3, 5	Tesla witnesses	B, I	
26	602	07/01/2014 Invoice 007075	3, 5	Tesla witnesses	B, I	
27	603	08/07/2014 Invoice 007131	3, 5	Tesla witnesses	B, I	
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1	604	08/13/2014	Invoice 007136	3, 5	Tesla witnesses	B, I	
2	605	08/15/2014	Invoice 007140	3, 5	Tesla witnesses	B, I	
3	606	08/15/2014	Invoice 007144	3, 5	Tesla witnesses	B, I	
4	607	08/18/2014	Invoice 007143	3, 5	Tesla witnesses	B, I	
5	608	09/04/2014	Invoice 007152	3, 5	Tesla witnesses	B, I	
6	609	09/04/2014	Invoice 007175	3, 5	Tesla witnesses	B, I	
7	610	09/12/2014	Invoice 007194	3, 5	Tesla witnesses	B, I	
8	611	09/12/2014	Invoice 007199	3, 5	Tesla witnesses	B, I	
9	612	09/26/2014	Invoice 007305	3, 5	Tesla witnesses	B, I	
10	613	10/14/2014	Invoice 007180	3, 5	Tesla witnesses	B, I	
11	614	10/15/2014	Invoice 007216	3, 5	Tesla witnesses	B, I	
12	615	10/20/2014	Invoice 007247	3, 5	Tesla witnesses	B, I	
13	616	10/31/2014	Invoice 007248	3, 5	Tesla witnesses	B, I	
14	617	11/03/2014	Invoice 007304	3, 5	Tesla witnesses	B, I	
15	618	11/09/2014	Invoice 007189	3, 5	Tesla witnesses	B, I	
16	619	11/13/2014	Invoice 007342	3, 5	Tesla witnesses	B, I	
17	620	11/17/2014	Invoice 007346	3, 5	Tesla witnesses	B, I	
18	621	11/28/2014	Invoice 007387	3, 5	Tesla witnesses	B, I	
19	622	12/08/2014	Invoice 007074	3, 5	Tesla witnesses	B, I	
20	623	12/09/2014	Invoice 007192	3, 5	Tesla witnesses	B, I	
21	624	12/15/2014	Invoice 007072	3, 5	Tesla witnesses	B, I	
22	625	12/15/2014	Invoice 007073	3, 5	Tesla witnesses	B, I	
23	626	12/15//2014	Invoice 007426	3, 5	Tesla witnesses	B, I	
24	627	12/15/2014	Invoice 007 441	3, 5	Tesla witnesses	B, I	
25	628	12/31/2014	Invoice 007508	3, 5	Tesla witnesses	B, I	
26	629	01/15/2015	Invoice 007533	3, 5	Tesla witnesses	B, I	

1	630	01/15/2015	Invoice 007568	3, 5	Tesla witnesses	B, I	
2	631	01/21/2015	Invoice 007587	3, 5	Tesla witnesses	B, I	
3	632	01/27/2015	Invoice 007589	3, 5	Tesla witnesses	B, I	
4	633	01/31/2015	Invoice 007590	3, 5	Tesla witnesses	B, I	
5	634	01/31/2015	Invoice 007598	3, 5	Tesla witnesses	B, I	
6	635	02/10/2015	Invoice 007677	3, 5	Tesla witnesses	B, I	
7	636	02/15/2015	Invoice 007634	3, 5	Tesla witnesses	B, I	
8	637	02/15/2015	Invoice 007678	3, 5	Tesla witnesses	B, I	
9	638	02/19/2015	Invoice 007699	3, 5	Tesla witnesses	B, I	
10	639	02/23/2015	Invoice 007705	3, 5	Tesla witnesses	B, I	
11	640	02/23/2015	Invoice 007706	3, 5	Tesla witnesses	B, I	
12	641	03/03/2015	Invoice 007707	3, 5	Tesla witnesses	B, I	
13	642	03/06/2015	Invoice 007708	3, 5	Tesla witnesses	B, I	
14	643	03/06/2015	Invoice 007716	3, 5	Tesla witnesses	B, I	
15	644	03/06/2015	Invoice 007717	3, 5	Tesla witnesses	B, I	
16	645	03/16/2015	Invoice 007776	3, 5	Tesla witnesses	B, I	
17	646	03/16/2015	Invoice 007837	3, 5	Tesla witnesses	B, I	
18	647	03/17/2015	Invoice 007774	3, 5	Tesla witnesses	B, I	
19	648	03/07/2015	Invoice 007775	3, 5	Tesla witnesses	B, I	
20	649	03/24/2015	Invoice 007998	3, 5	Tesla witnesses	B, I	
21	650	03/25/2015	Invoice 007995	3, 5	Tesla witnesses	B, I	
22	651	03/31/2015	Invoice 007843	3, 5	Tesla witnesses	B, I	
23	652	03/31/2015	Invoice 007844	3, 5	Tesla witnesses	B, I	
24	653	04/02/2015	Invoice 007632	3, 5	Tesla witnesses	B, I	
25	654	04/06/2015	Invoice 007845	3, 5	Tesla witnesses	B, I	
26	655	04/06/2015	Invoice 007892	3, 5	Tesla witnesses	B, I	

1	656	04/07/2015	Invoice 007080	3, 5	Tesla witnesses	B, I	
2	657	04/09/2015	Invoice 007094	3, 5	Tesla witnesses	B, I	
3	658	04/14/2015	Invoice 007091	3, 5	Tesla witnesses	B, I	
4	659	04/23/2015	Invoice 007903	3, 5	Tesla witnesses	B, I	
5	660	04/23/2015	Invoice 007919	3, 5	Tesla witnesses	B, I	
6	661	04/24/2015	Invoice 007918	3, 5	Tesla witnesses	B, I	
7	662	04/24/2015	Invoice 007992	3, 5	Tesla witnesses	B, I	
8	663	04/29/2015	Invoice 007994	3, 5	Tesla witnesses	B, I	
9	664	05/05/2015	Invoice 007999	3, 5	Tesla witnesses	B, I	
10	665	05/06/2015	Invoice 007997	3, 5	Tesla witnesses	B, I	
11	666	05/07/2015	Invoice 008001	3, 5	Tesla witnesses	B, I	
12	667	05/15/2015	Invoice 008073	3, 5	Tesla witnesses	B, I	
13	668	05/15/2015	Invoice 008082	3, 5	Tesla witnesses	B, I	
14	669	05/21/2015	Invoice 008096	3, 5	Tesla witnesses	B, I	
15	670	06/01/2015	Invoice 008097	3, 5	Tesla witnesses	B, I	
16	671	06/01/2015	Invoice 008098	3, 5	Tesla witnesses	B, I	
17	672	06/02/2015	Invoice 008100	3, 5	Tesla witnesses	B, I	
18	673	06/03/2015	Invoice 008099	3, 5	Tesla witnesses	B, I	
19	674	06/03/2015	Invoice 008199	3, 5	Tesla witnesses	B, I	
20	675	06/05/2015	Invoice 008167	3, 5	Tesla witnesses	B, I	
21	676	06/05/2015	Invoice 008178	3, 5	Tesla witnesses	B, I	
22	677	06/05/2015	Invoice 008185	3, 5	Tesla witnesses	B, I	
23	678	06/05/2015	Invoice 008212	3, 5	Tesla witnesses	B, I	
24	679	06/08/2015	Invoice 008431	3, 5	Tesla witnesses	B, I	
25	680	06/11/2015	Invoice 007077	3, 5	Tesla witnesses	B, I	
26	681	06/17/2015	Invoice 008055	3, 5	Tesla witnesses	B, I	

1	682	06/17/2015	Invoice 008213	3, 5	Tesla witnesses	B, I	
2	683	06/17/2015	Invoice 008216	3, 5	Tesla witnesses	B, I	
3	684	06/19/2015	Invoice 008214	3, 5	Tesla witnesses	B, I	
4	685	06/22/2015	Invoice 007090	3, 5	Tesla witnesses	B, I	
5	686	07/07/2015	Invoice 007071	3, 5	Tesla witnesses	B, I	
6	687	07/08/2015	Invoice 007070	3, 5	Tesla witnesses	B, I	
7	688	07/08/2015	Invoice 008230	3, 5	Tesla witnesses	B, I	
8	689	07/08/2015	Invoice 008303	3, 5	Tesla witnesses	B, I	
9	690	07/27/2015	Invoice 008330	3, 5	Tesla witnesses	B, I	
10	691	07/27/2015	Invoice 008346	3, 5	Tesla witnesses	B, I	
11	692	07/29/2015	Invoice 008328	3, 5	Tesla witnesses	B, I	
12	693	07/29/2015	Invoice 008329	3, 5	Tesla witnesses	B, I	
13	694	08/06/2015	Invoice 008072	3, 5	Tesla witnesses	B, I	
14	695	08/06/2015	Invoice 008176	3, 5	Tesla witnesses	B, I	
15	696	08/06/2015	Invoice 008197	3, 5	Tesla witnesses	B, I	
16	697	08/06/2015	Invoice 008210	3, 5	Tesla witnesses	B, I	
17	698	08/06/2015	Invoice 008375	3, 5	Tesla witnesses	B, I	
18	699	08/09/2015	Invoice 008449	3, 5	Tesla witnesses	B, I	
19	700	08/10/2015	Invoice 008574	3, 5	Tesla witnesses	B, I	
20	701	08/13/2015	Invoice 008625	3, 5	Tesla witnesses	B, I	
21	702	08/13/2015	Invoice 008376	3, 5	Tesla witnesses	B, I	
22	703	08/18/2015	Invoice 008432	3, 5	Tesla witnesses	B, I	
23	704	08/18//2015	Invoice 008448	3, 5	Tesla witnesses	B, I	
24	705	09/08/2015	Invoice 008451	3, 5	Tesla witnesses	B, I	
25	706	09/11/2015	Invoice 008560	3, 5	Tesla witnesses	B, I	
26	707	09/14/2015	Invoice 007076	3, 5	Tesla witnesses	B, I	

1	708	09/18/2015	Invoice 008453	3, 5	Tesla witnesses	B, I	
2	709	09/18/2015	Invoice 008454	3, 5	Tesla witnesses	B, I	
3	710	09/18/2015	Invoice 008465	3, 5	Tesla witnesses	B, I	
4	711	09/21/2015	Invoice 008467	3, 5	Tesla witnesses	B, I	
5	712	09/21/2015	Invoice 008489	3, 5	Tesla witnesses	B, I	
6	713	09/29/2015	Invoice 008491	3, 5	Tesla witnesses	B, I	
7	714	09/29/2015	Invoice 008492	3, 5	Tesla witnesses	B, I	
8	715	09/29/2015	Invoice 008494	3, 5	Tesla witnesses	B, I	
9	716	09/30/2015	Invoice 008493	3, 5	Tesla witnesses	B, I	
10	717	10/21/2015	Invoice 008495	3, 5	Tesla witnesses	B, I	
11	718	10/21/2015	Invoice 008561	3, 5	Tesla witnesses	B, I	
12	719	10/22/2015	Invoice 008555	3, 5	Tesla witnesses	B, I	
13	720	11/06/2015	Invoice 008445	3, 5	Tesla witnesses	B, I	
14	721	11/06/2015	Invoice 008575	3, 5	Tesla witnesses	B, I	
15	722	11/06/2015	Invoice 008626	3, 5	Tesla witnesses	B, I	
16	723	11/06/2015	Invoice 008629	3, 5	Tesla witnesses	B, I	
17	724	11/17/2015	Invoice 008630	3, 5	Tesla witnesses	B, I	
18	725	11/17/2015	Invoice 008631	3, 5	Tesla witnesses	B, I	
19	726	11/30/2015	Invoice 008634	3, 5	Tesla witnesses	B, I	
20	727	11/30/2015	Invoice 008685	3, 5	Tesla witnesses	B, I	
21	728	12/07/2015	Invoice 007993	3, 5	Tesla witnesses	B, I	
22	729	12/08/2015	Invoice 007206	3, 5	Tesla witnesses	B, I	
23	730	12/09/2015	Invoice 007148	3, 5	Tesla witnesses	B, I	
24	731	12/09/2015	Invoice 007150	3, 5	Tesla witnesses	B, I	
25	732	12/14/2015	Invoice 007412	3, 5	Tesla witnesses	B, I	
26	733	12/31/2015	Invoice 008624	3, 5	Tesla witnesses	B, I	

1	734	12/31/2015	Invoice 007055	3, 5	Tesla witnesses	B, I	
2	735	12/31/2015	Invoice 007295	3, 5	Tesla witnesses	B, I	
3	736	12/31/2015	Invoice 008729	3, 5	Tesla witnesses	B, I	
4	737	01/29/2016	Invoice 007146	3, 5	Tesla witnesses	B, I	
5	738	01/29/2016	Invoice 007344	3, 5	Tesla witnesses	B, I	
6	739	01/29/2016	Invoice 008374	3, 5	Tesla witnesses	B, I	
7	740	02/06/2016	Invoice 008684	3, 5	Tesla witnesses	B, I	
8	741	02/19/2016	Invoice 008730	3, 5	Tesla witnesses	B, I	
9	742	02/19/2016	Invoice 007128	3, 5	Tesla witnesses	B, I	
10	743	02/22/2016	Invoice 007197	3, 5	Tesla witnesses	B, I	
11	744	03/03/2016	Invoice 008632	3, 5	Tesla witnesses	B, I	
12	745	03/15/2016	Invoice 007574	3, 5	Tesla witnesses	B, I	
13	746	03/15/2016	Invoice 007585	3, 5	Tesla witnesses	B, I	
14	747	03/15/2016	Invoice 008699	3, 5	Tesla witnesses	B, I	
15	748	03/16/2015	Invoice 008680	3, 5	Tesla witnesses	B, I	
16	749	03/23/2016	Invoice 008559	3, 5	Tesla witnesses	B, I	
17	750	04/21/2016	Invoice 007215	3, 5	Tesla witnesses	B, I	
18	751	04/27/2016	Invoice 008721	3, 5	Tesla witnesses	B, I	
19	752	04/28/2016	Invoice 008495	3, 5	Tesla witnesses	B, I	
20	753	04/28/2016	Invoice 008724	3, 5	Tesla witnesses	B, I	
21	754	05/04/2016	Invoice 007531	3, 5	Tesla witnesses	B, I	
22	755	05/04/2016	Invoice 007532	3, 5	Tesla witnesses	B, I	
23	756	05/12/2016	Invoice 008726	3, 5	Tesla witnesses	B, I	
24	757	05/19/2016	Invoice 008732	3, 5	Tesla witnesses	B, I	
25	758	05/25/2016	Invoice 007106	3, 5	Tesla witnesses	B, I	
26	759	05/26/2016	Invoice 007107	3, 5	Tesla witnesses	B, I	

1	760	05/26/2016	Invoice 007108	3, 5	Tesla witnesses	B, I	
2	761	05/26/2016	Invoice 007115	3, 5	Tesla witnesses	B, I	
3	762	05/26/2016	Invoice 007125	3, 5	Tesla witnesses	B, I	
4	763	05/26/2016	Invoice 007126	3, 5	Tesla witnesses	B, I	
5	764	05/31/2016	Invoice 007127	3, 5	Tesla witnesses	B, I	
6	765	05/05/2016	Invoice 007633	3, 5	Tesla witnesses	B, I	
7	766	06/07/2016	Invoice 007129	3, 5	Tesla witnesses	B, I	
8	767	06/10/2016	Invoice 007130	3, 5	Tesla witnesses	B, I	
9	768	07/06/2016	Invoice 007204	3, 5	Tesla witnesses	B, I	
10	769	07/06/2016	Invoice 007205	3, 5	Tesla witnesses	B, I	
11	770	07/27/2016	Invoice 008723	3, 5	Tesla witnesses	B, I	
12	771	07/27/2016	Invoice 008725	3, 5	Tesla witnesses	B, I	
13	772	08/02/2016	Invoice 007330	3, 5	Tesla witnesses	B, I	
14	773	08/17/2016	Invoice 008227	3, 5	Tesla witnesses	B, I	
15	774	08/18/2016	Invoice 008226	3, 5	Tesla witnesses	B, I	
16	775	08/23/2016	Invoice 007423	3, 5	Tesla witnesses	B, I	
17	776	08/25/2016	Invoice 008734	3, 5	Tesla witnesses	B, I	
18	777	09/11/2016	Invoice 008321	3, 5	Tesla witnesses	B, I	
19	778	09/30/2016	Invoice 008682	3, 5	Tesla witnesses	B, I	
20	779	09/30/2016	Invoice 008727	3, 5	Tesla witnesses	B, I	
21	780	10/05/2016	Invoice 008626	3, 5	Tesla witnesses	B, I	
22	781	10/24/2016	Invoice 008702	3, 5	Tesla witnesses	B, I	
23	782	10/27/2016	Invoice 008455	3, 5	Tesla witnesses	B, I	
24	783	10/31/2016	Invoice 008692	3, 5	Tesla witnesses	B, I	
25	784	11/17/2016	Invoice 008700	3, 5	Tesla witnesses	B, I	
26	785	11/18/2016	Invoice 008716	3, 5	Tesla witnesses	B, I	

1	786	11/30/2016	Invoice 007414	3, 5	Tesla witnesses	B, I	
2	787	11/30/2016	Invoice 007425	3, 5	Tesla witnesses	B, I	
3	788	12/04/2016	Invoice 007195	3, 5	Tesla witnesses	B, I	
4	789	12/09/2016	Invoice 008709	3, 5	Tesla witnesses	B, I	
5	790	12/09/2016	Invoice 008838	3, 5	Tesla witnesses	B, I	
6	791	12/19/2016	Invoice 007191	3, 5	Tesla witnesses	B, I	
7	792	12/21/2016	Invoice 008452	3, 5	Tesla witnesses	B, I	
8	793	12/23/2016	Invoice 007771	3, 5	Tesla witnesses	B, I	
9	794	12/30/2016	Invoice 007246	3, 5	Tesla witnesses	B, I	
10	795	12/30/2016	Invoice 007413	3, 5	Tesla witnesses	B, I	
11	796	12/31/2016	Invoice 007214	3, 5	Tesla witnesses	B, I	
12	797	01/30/2017	Invoice 008681	3, 5	Tesla witnesses	B, I	
13	798	02/28/2017	Invoice 008733	3, 5	Tesla witnesses	B, I	
14	799	01/31/2017	Invoice 008705	3, 5	Tesla witnesses	B, I	
15	800	03/15/2017	Invoice 007045	3, 5	Tesla witnesses	B, I	
16	801	03/16/2017	Invoice 007046	3, 5	Tesla witnesses	B, I	
17	802	03/16/2017	Invoice 007048	3, 5	Tesla witnesses	B, I	
18	803	03/24/2017	Invoice 008819	3, 5	Tesla witnesses	B, I	
19	804	03/31/2017	Invoice 008862	3, 5	Tesla witnesses	B, I	
20	805	04/04/2017	Invoice 007050	3, 5	Tesla witnesses	B, I	
21	806	04/05/2017	Invoice 008832	3, 5	Tesla witnesses	B, I	
22	807	04/06/2017	Invoice 008833	3, 5	Tesla witnesses	B, I	
23	808	04/06/2017	Invoice 007051	3, 5	Tesla witnesses	B, I	
24	809	04/06/2017	Invoice 007052	3, 5	Tesla witnesses	B, I	
25	810	04/12/2017	Invoice 007053	3, 5	Tesla witnesses	B, I	
26	811	04/13/2017	Invoice 007054	3, 5	Tesla witnesses	B, I	

1	812	05/01/2017	Invoice 008861	3, 5	Tesla witnesses	B, I	
2	813	05/17/2017	Invoice 008229	3, 5	Tesla witnesses	B, I	
3	814	05/30/2017	Invoice 008633	3, 5	Tesla witnesses	B, I	
4	815	05/31/2017	Invoice 008821	3, 5	Tesla witnesses	B, I	
5	816	05/31/2017	Invoice 008827	3, 5	Tesla witnesses	B, I	
6	817	06/06/2017	Invoice 008808	3, 5	Tesla witnesses	B, I	
7	818	06/09/2017	Invoice 008859	3, 5	Tesla witnesses	B, I	
8	819	06/09/2017	Invoice 008860	3, 5	Tesla witnesses	B, I	
9	820	06/12/2017	Invoice 008750	3, 5	Tesla witnesses	B, I	
10	821	06/13/2017	Invoice 008785	3, 5	Tesla witnesses	B, I	
11	822	06/13/2017	Invoice 008858	3, 5	Tesla witnesses	B, I	
12	823	06/27/2017	Invoice 008736	3, 5	Tesla witnesses	B, I	
13	824	06/29/2017	Invoice 008738	3, 5	Tesla witnesses	B, I	
14	825	06/30/2017	Invoice 008739	3, 5	Tesla witnesses	B, I	
15	826	06/30/2017	Invoice 008856	3, 5	Tesla witnesses	B, I	
16	827	06/30/2017	Invoice 008857	3, 5	Tesla witnesses	B, I	
17	828	07/02/2017	Invoice 008691	3, 5	Tesla witnesses	B, I	
18	829	07/11/2017	Invoice 008810	3, 5	Tesla witnesses	B, I	
19	830	07/11/2017	Invoice 008813	3, 5	Tesla witnesses	B, I	
20	831	07/20/2017	Invoice 008799	3, 5	Tesla witnesses	B, I	
21	832	07/21/2017	Invoice 008816	3, 5	Tesla witnesses	B, I	
22	833	07/26/2017	Invoice 008836	3, 5	Tesla witnesses	B, I	
23	834	07/31/2017	Invoice 008741	3, 5	Tesla witnesses	B, I	
24	835	07/31/2017	Invoice 008748	3, 5	Tesla witnesses	B, I	
25	836	07/31/2017	Invoice 008796	3, 5	Tesla witnesses	B, I	
26	837	07/31/2017	Invoice 008853	3, 5	Tesla witnesses	B, I	

1	838	07/31/2017	Invoice 008854	3, 5	Tesla witnesses	B, I	
2	839	07/31/2017	Invoice 008855	3, 5	Tesla witnesses	B, I	
3	840	08/14/2017	Invoice 008851	3, 5	Tesla witnesses	B, I	
4	841	08/24/2017	Invoice 008780	3, 5	Tesla witnesses	B, I	
5	842	08/24/2017	Invoice 008786	3, 5	Tesla witnesses	B, I	
6	843	08/24/2017	Invoice 008793	3, 5	Tesla witnesses	B, I	
7	844	08/24/2017	Invoice 008850	3, 5	Tesla witnesses	B, I	
8	845	09/05/2017	Invoice 007770	3, 5	Tesla witnesses	B, I	
9	846	09/05/2017	Invoice 008466	3, 5	Tesla witnesses	B, I	
10	847	09/08/2017	Invoice 008800	3, 5	Tesla witnesses	B, I	
11	848	09/13/2017	Invoice 008774	3, 5	Tesla witnesses	B, I	
12	849	09/14/2017	Invoice 008848	3, 5	Tesla witnesses	B, I	
13	850	09/26/2017	Invoice 008756	3, 5	Tesla witnesses	B, I	
14	851	09/26/2017	Invoice 008757	3, 5	Tesla witnesses	B, I	
15	852	09/26/2017	Invoice 008758	3, 5	Tesla witnesses	B, I	
16	853	09/26/2017	Invoice 008759	3, 5	Tesla witnesses	B, I	
17	854	09/26/2017	Invoice 008760	3, 5	Tesla witnesses	B, I	
18	855	09/26/2017	Invoice 008761	3, 5	Tesla witnesses	B, I	
19	856	09/26/2017	Invoice 008762	3, 5	Tesla witnesses	B, I	
20	857	09/26/2017	Invoice 008763	3, 5	Tesla witnesses	B, I	
21	858	09/26/2017	Invoice 008764	3, 5	Tesla witnesses	B, I	
22	859	09/29/2017	Invoice 008845	3, 5	Tesla witnesses	B, I	
23	860	09/29/2017	Invoice 008846	3, 5	Tesla witnesses	B, I	
24	861	09/29/2017	Invoice 008847	3, 5	Tesla witnesses	B, I	
25	862	09/30/2017	Invoice 008776	3, 5	Tesla witnesses	B, I	
26	863	10/05/2017	Invoice 007841	3, 5	Tesla witnesses	B, I	

1	864	10/10/2017	Invoice 008743	3, 5	Tesla witnesses	B, I	
2	865	10/10/2017	Invoice 008765	3, 5	Tesla witnesses	B, I	
3	866	10/10/2017	Invoice 008766	3, 5	Tesla witnesses	B, I	
4	867	10/24/2017	Invoice 008773	3, 5	Tesla witnesses	B, I	
5	868	10/26/2017	Invoice 008792	3, 5	Tesla witnesses	B, I	
6	869	10/31/2017	Invoice 008789	3, 5	Tesla witnesses	B, I	
7	870	11/08/2017	Invoice 008769	3, 5	Tesla witnesses	B, I	
8	871	11/08/2017	Invoice 008770	3, 5	Tesla witnesses	B, I	
9	872	11/16/2017	Invoice 008767	3, 5	Tesla witnesses	B, I	
10	873	11/31/2017	Invoice 008842	3, 5	Tesla witnesses	B, I	
11	874	11/21/2017	Invoice 008843	3, 5	Tesla witnesses	B, I	
12	875	11/21/2017	Invoice 088844	3, 5	Tesla witnesses	B, I	
13	876	11/22/2017	Invoice 008771	3, 5	Tesla witnesses	B, I	
14	877	11/24/2017	Invoice 008753	3, 5	Tesla witnesses	B, I	
15	878	11/29/2017	Invoice 008749	3, 5	Tesla witnesses	B, I	
16	879	11/29/2017	Invoice 008752	3, 5	Tesla witnesses	B, I	
17	880	11/30/2017	Invoice 008782	3, 5	Tesla witnesses	B, I	
18	881	12/14/2017	Invoice 008777	3, 5	Tesla witnesses	B, I	
19	882	10/16/2017	Invoice 008747	3, 5	Tesla witnesses	B, I	
20	883	03/13/2018	Invoice 008755	3, 5	Tesla witnesses	B, I	
21	884	12/31/2015	Durr Invoice 007059	3, 5	Tesla witnesses	B, I	
22	885	12/31/2015	Durr Invoice 007061	3, 5	Tesla witnesses	B, I	
23	886	12/31/2015	Durr Invoice 007062	3, 5	Tesla witnesses	B, I	
24	887	12/31/2015	Durr Invoice 007064	3, 5	Tesla witnesses	B, I	
25	888		Tesla spreadsheets and charts for contractors	1, 2, 3, 5	Tesla witnesses		

6

Exhibit No.	Description	Purpose	Sponsor	Objections	Response
1000	TESLA_EVANS-000068-TESLA_EVANS-000069 (Purchase Order)	Tesla paid Vuzem \$55 per hour for work provided by Vuzem's employees	Will Drewery / Bobby Gonzales / Tara Lucier	C, F, H	
1001	TESLA_MASLIC009736-TESLA_MASLIC010121 (Fremont paint shop project labor and cost breakdown)	Tesla paid Vuzem \$55 per hour for work provided by Vuzem's employees	Tara Lucier	C, F, H	
1002	TESLA_MASLIC000811 (2/5/15 email from Bobby Gonzales)	Other safety incidents at Fremont facility	Bobby Gonzales	A, C	
1003	TESLA_MASLIC000815 (2/1/15 accident report)	Other safety incidents at Fremont facility	Bobby Gonzales	A, C	
1004	TESLA_MASLIC001159 (5/6/15 incident report and communications)	Other safety incidents at Fremont facility	Bobby Gonzales	A, C	
1005	TESLA_MASLIC00128 (5/18/15 email from Robert Vuzem)	Vuzem safety efforts at Fremont facility	Bobby Gonzales / Robert Thomas	A, C	
1006	TESLA_MASLIC002235 (9/25/15 accident report)	Other safety incidents at Fremont facility	Bobby Gonzales	A, C	

<sup>6</sup> Plaintiff objects that Tesla did not provide an exhibit list until July 16, and did not provide a final list until July 18, 2024. Plaintiff reserves all objections based on this delay

1	1007	TESLA_MASLIC002246 TESLA_MASLIC002247 (10/9/15 email from Robert Thomas with attached report of Most High Risk Contractor Companies Onsite)	Other safety incidents at Fremont facility	Robert Thomas / Aleksandra Janevska	A, C	
2	1008	TESLA_MASLIC000066 TESLA_MASLIC000067 (4/18/12 incident email and incident report)	Other safety incidents at Fremont facility	Bobby Gonzales	A, C	
3	1009	TESLA_MASLIC000073 TESLA_MASLIC000074 (7/26/12 email and incident report)	Other safety incidents at Fremont facility	Bobby Gonzales	A, C	
4	1010	TESLA_MASLIC000090 TESLA_MASLIC000092 (6/6/13 email and incident report)	Other safety incidents at Fremont facility	Bobby Gonzales	A, C	
5	1011	TESLA_MASLIC000095 TESLA_MASLIC000096 (6/26/13 email and incident report)	Other safety incidents at Fremont facility	Bobby Gonzales	A, C	
6	1012	TESLA_MASLIC000130 TESLA_MASLIC000131 (10/16/13 email and incident report)	Other safety incidents at Fremont facility	Bobby Gonzales	A, C	
7	1013	TESLA_MASLIC000184 (5/2/14 email re car accident)	Other safety incidents at Fremont facility	Bobby Gonzales	A, C	
8	1014	TESLA_MASLIC000548- TESLA_MASLIC000559 (8/13/14 email and incident reports)	Other safety incidents at Fremont facility	Bobby Gonzales	A, C	
9	1015	TESLA_MASLIC000575 TESLA_MASLIC000576 (9/4/14 email and incident report)	Other safety incidents at Fremont facility	Bobby Gonzales	A, C	
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1	1016	TESLA_MASLIC000003 (Code of Business Conduct and Ethics, adopted 5/20/2010)	Safety policies and procedures at Tesla	Tara Lucier	A, C	
2	1017	TESLA_MASLIC000121 (Contractor EHS Guidelines)	Safety policies and procedures at Tesla	Bobby Gonzales / Aleksandra Janevska	A, C	
3	1018	TESLA_MASLIC000165 (Tesla Motors Insurance Requirements (Fremont Site))	Internal policies and procedures at Tesla	Bobby Gonzales / Tara Lucier	A, C	
4	1019	TESLA_MASLIC000379 (Contractor Safety Requirements)	Safety policies and procedures at Tesla	Bobby Gonzales / Aleksandra Janevska	A, C	
5	1020	TESLA_MASLIC000389 (Tesla Plant (Fremont Site) Access Requirements For Contractor, Vendor and Others To Perform Work Onsite)	Safety and internal policies and procedures at Tesla	Bobby Gonzales / Aleksandra Janevska / Jeremie Hansen	A, C	
6	1021	TESLA_MASLIC000524 (Purchase order)	Term, conditions, and relationship between Tesla and Eisenmann Corporation, as general contractor for Fremont paint shop project	William Drewery	A, C	
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1	1022	TESLA_MASLIC000465-TESLA_MASLIC000494 (Drewery Dep. Ex. 61)	Term, conditions, and relationship between Tesla and Eisenmann Corporation, as general contractor for Fremont paint shop project	William Drewery	A, C	
2	1023	<i>Lesnik v. Eisenmann SE, et al.</i> , Case No. 5:16-cv-01120, ECF #466-2, 2/18/20 Affidavit of Sasa Maslic (with translation)	Records of Maslic's work and circumstances at Tesla	Sasa Maslic		
3	1024	<i>Lesnik v. Eisenmann SE, et al.</i> , Case No. 5:16-cv-01120, ECF #487-3, 4/23/2020 Affidavit of Sasa Maslic (with translation)	Records of Maslic's work and circumstances at Tesla	Sasa Maslic		
4	1025	Plaintiff Sasa Maslic's Responses to Defendant Tesla, Inc.'s First Set of Interrogatories, Requests for Production, and Requests for Admission (1/16/24)	Plaintiff's written discovery responses and admissions	Sasa Maslic		
5	1026	Sasa Maslic Deposition Exhibit 2	Circumstances surrounding Maslic's decision to work for Vuzem	Sasa Maslic		
6	1027	Sasa Maslic Deposition Exhibit 4	Circumstances of Maslic's work and living conditions in California	Sasa Maslic		
7	1028	Sasa Maslic Deposition Exhibit 6	Maslic's physical condition and abilities	Sasa Maslic		

1 2 3 4	1029  TESLA_MASLIC002073-TESLA_MASLIC002076 (724/15 Email from Bobby Gonzales to Various Recipients with attached photographs)	Circumstances of Vuzem employees and work at Tesla plant	Bobby Gonzales	A, C	
5 6 7 8 9 10	1030  Expert Report of James L. Chen, M.D.	Facilitate Dr. Chen's testimony rebutting Plaintiff's expert's opinions that Plaintiff's injuries were caused by his work for Vuzem at Tesla	Dr. James Chen	I	
11 12 13 14 15	1031  Expert Report of Marc Evans	Facilitate Mr. Evans's testimony that Maslic's work and circumstances are inconsistent with human trafficking	Marc Evans	I	
16 17 18 19	1032  Excerpts of Deposition of Robert Emerson Thomas	Safety procedures at Tesla; Tesla's lack of control of Vuzem's work	Robert Emerson Thomas	I	

**EXHIBIT KEY****Maslic Key**

- 21 1. Coercion
- 22 2. Knew or should have known
- 23 3. Financial benefit, including participation in venture
- 24 4. Damages [compensatory]
- 25 5. Response to defenses

1      **Note:** all are relevant to claim for exemplary damages, and all are relevant to agency, authority  
2      and authentication

3      **RJN** – Request for Judicial Notice

4      **Attorneys** - Custodian of Records, Gordon & Rees [Brian Paul Maschler, deceased]

5      Michal Kubicki, Gordon & Rees

6      Custodian of Records, Harrington, Foxx, Dubrow & Canter, LLP

7      Anoush C Holaday, Wood, Smith Henning & Berman, LLP

8      Gregory Grinberg

9      Aaron Bernay

10     **Tesla witnesses** – Rick Baird; Greg Sletvett, Jonatan Hung, Samantha Nordberg, Rich Schmidt,  
11     Wade Hill, Bobby Gonzales, Marc Evans, William Drewery, Robert Thomas

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13     **Objections Key**

- 14        A. Lack of Foundation/Personal Knowledge (Fed. R. Evid. 602)
- 15        B. Irrelevant (Fed. R. Evid. 402 & 403)
- 16        C. Hearsay (Fed. R. Evid. 801 & 802)
- 17        D. Improper subject for judicial notice (Fed. R. Evid. 201)
- 18        E. Improper Lay Opinion (Fed. R. Evid. 701)
- 19        F. Authentication (Fed. R. Evid. 901)
- 20        G. Deposition not being used for permissible purpose under Rule 32(a)(2)-(8) (Fed. R. Civ.  
21           P. 32)
- 22        H. Preserved: Defendant preserves all stated and otherwise preserved objections found in  
23           depositions
- 24        I. Conditional: Defendant reserves right to object to this exhibit at trial depending on  
25           purpose for which Plaintiff seeks to introduce it

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28      0155814.0780232 4880-4119-8288v12